POTE	NTIAL HAZAR	DOUS WAST	E SITE	1 —	. IDENTIFI	
	SITE INSPECT			{'		SITE NUMBER
PART 1 - SITE	LOCATION AND			ATION L	4	W0299
II. SITE NAME AND LOCATION						
01 SITE NAME (Legal, common, or describere name of site)	*	02 STREET ROUT	ENO DA SP	ECIFIC LOCATION IDE	ENTYFIER	
	*	11120				*
SPECTRUM PRINTING		7/32	0, 0	H194W4	17 6	
	:	04 STATE 05 ZIP		06 COUNTY		07COUNTY 08 CONG CODE DIST
COVINGTON			209	NEWTO	N _	
	TYPE OF OWNERSH			C. STATE D.	COUNTY	7 E MUNICIPAL
33 36 LS. 8332 63.	SEF. OTHER	PAJ59522	SHIP		UNKNOWN	
III. INSPECTION INFORMATION						
	3 YEARS OF OPERAT	TON				
8 24 87 T ACTIVE		1			NKNOWN	
MONTH DAY YEAR 04 AGENCY PERFORMING INSPECTION (Check of their sopry)	BEG	NNING YEAR	NDING YEAR			
7 .	NESTON		. =			
(Nam	ne of firm)		L UD.M	UNICIPAL CONTRA	CTOR	(Name of firm)
☐ E. STATE ☐ F. STATE CONTRACTOR	ne of firm)	G. OTHER		(Specify)		
05 CHIEF INSPECTOR	06 TITLE			07 ORGANIZATI	ON	DE TELEPHONE NO.
JOHN ASHLEY BROWN	CIVIL &	EN GINE	ER	ROYF. WA	E57014	(409) 352 4147
09 OTHER INSPECTORS	10 TITLE			11 ORGANIZATI		12 TELEPHONE NO.
1.) V1" L.	E 01	BKC		EPA		(404) 2117.200
11. 1 IUT2	Z IVA	vac		EPA		11.347.398/
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13 SITE REPRESENTATIVES INTERVIEWED	14 TITLE	15A00AI	:55		i	16 TELEPHONE NO
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17 ACCESS GAINED BY 18 TIME OF INSPECTION	19 WEATHER CON	OTTIONS				
(Check ene)	i	· · · · · ·	A .			1
M PERMISSION 0900	LLEA	e, war	17			
IV. INFORMATION AVAILABLE FROM	L					
OI CONTACT	02 OF (Agency/Organ	Restant			10	3 TELEPHONE NO.
	1	_	F NA-	URALRES	.	(44) 656-2836
RAMONA J. KLEIN		<u>·</u>				•
04 PERSON RESPONSIBLE FOR SITE INSPECTION FORM	05 AGENCY	06 ORGANIZAT	ON	07 TELEPHONE N	0.	DE DATE
JOHN ASHLEY BROWN	EPA-TAT	ROYF.	WESTUR	(404) 354	711	8 14,87 SONTH DAY YEAR

\$EPA

POTENTIAL HAZARDOUS WASTE SITE SITE INSPECTION REPORT ART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENT

I. IDENTIFICATION

OLISTATE OF SITE NUMBER

OLISTATE OF SITE NUMBER

OLISTATE OF SITE NUMBER

PART 3 - DESCRIPTION OF HA	AZARDOUS CONDITIONS AND INCIDENTS
II. HAZARDOUS CONDITIONS AND INCIDENTS	00 C 00000 CD 04 F 9 277-6-7
01 PA. GROUNDWATER CONTAMINATION 30174 OF 03 POPULATION POTENTIALLY AFFECTED: COMMISTEN	02 GOBSERVED (DATE: 8-24-87) POTENTIAL GALLEGED 04 NARRATIVE DESCRIPTION
RAIN RUNOFF FROM OPEN DRUIMS	AND SPILLED MATERIAL ON SITE MOST LIKELY
WILL RUN INTO PRIFO INDIAN CRI	EGK WHICH IS A DRAWAGE PATH WHICH TRAVELS
SOUTH AND DRIES UP OURING P	GOIDDS OF LITTLE RAINFAIL.
	Chief 3
01 %B. SURFACE WATER CONTAMINATION SOUTH OF 03 POPULATION POTENTIALLY AFFECTED: COVINGT 014	02 C OBSERVED (DATE: B-14-67) SPOTENTIAL CALLEGED 04 NARRATIVE DESCRIPTION
RAIN RAINEE SO DOS DOM	S AND SPILLED NATORIAL ON SITE WILL
MOST LIKELY MAKE ITS WAY	
MOST LIKELY MAKE ITS WAY	OKIGO INDIMI CREEK
	B 51/13
01 TR C. CONTAMINATION OF AIR 03 POPULATION POTENTIALLY AFFECTED: COMMANTAIN	02 C OBSERVED (DATE: 8.24-87) POTENTIAL CALLEGED 04 NARRATIVE DESCRIPTION
EUGPORATION OF SOLVENTS (CARRICOS) IN OPEN DRIMS
To thought the sounds (- Michigan
01 D. FIRE EXPLOSIVE CONDITIONS	02 C OBSERVED (DATE:) C POTENTIAL C ALLEGED
03 POPULATION POTENTIALLY AFFECTED:	04 NARRATIVE DESCRIPTION
01 ME. DIRECT CONTACT 03 POPULATION POTENTIALLY AFFECTED: CONTACT	02 © OBSERVED (DATE: 8-24-87) POTENTIAL © ALLEGED 04 NARRATIVE DESCRIPTION
A 4	
MATERIAL IN OPEN DRUM	S IS EASILY ACCESSIBLE TO PURLIC
	·
01 F. CONTAMINATION OF SOIL 03 AREA POTENTIALLY AFFECTED:	02 TOBSERVED (DATE: 8-14-87) TOTENTIAL MALLEGED
03 AREA POTENTIALLY AFFECTED:	04 NARRATIVE DESCRIPTION
	A THE CONTRACT OF THE
SPILLAGE OF MAYERIAL O	n the Ground was observed Bencath
	FINTO THE SPECTRUM PRINTING BUILDING
116 (60.116)	
01 C G. DRINKING WATER CONTAMINATION	02 🗆 OBSERVED (DATE:) 🗀 POTENTIAL 🗆 ALLEGED
03 POPULATION POTENTIALLY AFFECTED:	04 NARRATIVE DESCRIPTION
01 K.H. WORKER EXPOSUBE/INJURY	02 C OBSERVED (DATE: 8-24-87) POTENTIAL C ALLEGED
03 WORKERS POTENTIALLY AFFECTED:	04 NARRATIVE DESCRIPTION
IN THE EVENT OF ACKEMUP	CARE SHOULD BE EXERCISED AS MANY OF
THE PALLETS DRUMS ARE STA	ICKED ON APPEAR UNSOUND
The Libral D Manne Ale al.	,
	00.00 00000
01 □ I. POPULATION EXPOSURE/INJURY 03 POPULATION POTENTIALLY AFFECTED:	02 G OBSERVED (DATE:) DOTENTIAL ALLEGED 04 NARRATIVE DESCRIPTION

\$	EP	A
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I. IDENTIFICATION					
OLSTATE	02 SITE NUMBER W029				

A. SURFACE IMPOUNDMENT B. PILES C. DRUMS, ABOVE GROUND D. TANK, ABOVE GROUND E. TANK, BELOW GROUND F. LANDFILL G. LANDFARM H. OPEN DUMP I. OTHER ISOCCHY) O7 COMMENTS IV. CONTAINMENT A. ADEQUATE, SECURE D2 DESCRIPTION OF DRUMS, DIKING, LINERS, BARRIERS, ETC. V. ACCESSIBILITY	03 DATE	E ISSUED	04 EXPIRATION D	ATE 05 COMMENTS	
Chock at that apply) A NPDES B. UIC C. AIR D. RCRA E. RCRA INTERIM STATUS F. SPCC PLAN G. STATE (SOCCH) C. I. OTHER (SOCCH) C. I. OTHER (SOCCH) C. STORAGE DISPOSAL (Check at that Apply) A. SURFACE IMPOUNDMENT B. PILES C. DRUMS, ABOVE GROUND D. TANK, ABOVE GROUND E. TANK, BELOW GROUND G. LANDFRL G. LANDFRL G. LANDFRL C. OTHER (SOCCH) C. OTHER (SOCCH) C. OTHER (SOCCH) C. DRUMS ABOVE GROUND C. TANK, BELOW GROUND C. TOTHER (SOCCH) C. CONTAINMENT C. OOMMENTS D. CONTAINMENT C. CONTAI	03 DATE	EISSUED	04 EXPIRATION D	ATE 05 COMMENTS	
□ B. UIC □ C. AIR □ D. RCRA □ E. RCRA INTERIM STATUS □ F. SPCC PLAN □ G. STATE Specify □ H. LOCAL Specify □ J. NONE III. SITE DESCRIPTION □ STORAGE DISPOSAL ICIDEN AND THE ADDITY □ B. PILES □ C. DRUMS, ABOVE GROUND □ D. TANK, ABOVE GROUND □ E. TANK, BELOW GROUND □ F. LANDFILL □ G. LANDFARM □ H. OPEN DUMP □ I. OTHER □ Specify OT COMMENTS IV. CONTAINMENT □ A. ADEQUATE, SECURE □ B. MODERATE DESCRIPTION OF DRUMS, DIKING, LINERS, BARRIERS, ETC.					
□ B. UIC □ C. AIR □ D. RCRA □ E. RCRA INTERIM STATUS □ F. SPCC PLAN □ G. STATE Specify □ H. LOCAL Specify □ J. NONE □ STORAGE DISPOSAL ICINER OF ITHAL ROPIN OF AMOUNT ON THE SPECIAL OF				 -	•
C. AIR D. RCRA E. RCRA INTERIM STATUS F. SPCC PLAN G. STATE / Specify H. LOCAL Specify J. NONE III. SITE DESCRIPTION OS STORAGE DISPOSAL (Check of link apply) A. SURFACE IMPOUNDMENT B. PILES C. DRUMS, ABOVE GROUND D. TANK, ABOVE GROUND E. TANK, BELOW GROUND G. LANDFRL H. OPEN DUMP J. OTHER Specify OT COMMENTS V. CONTAINMENT A. ADEQUATE, SECURE B. MODERATE DESCRIPTION OF DRUMS, DIKING, LINERS, BARRIERS, ETC.				ı	
☐ D. RCRA ☐ E. RCRA INTERIM STATUS ☐ F. SPCC PLAN ☐ G. STATE: SOBECTY! ☐ H. LOCAL SOBECTY! ☐ J. OTHER: SOBECTY! ☐ J. NONE ☐ STORAGE DISPOSAL (CINER MITTAL ADDITAL) ☐ A. SURFACE IMPOUNDMENT ☐ B. PILES ☐ C. DRUMS, ABOVE GROUND ☐ D. TANK, ABOVE GROUND ☐ E. TANK, BELOW GROUND ☐ F. LANDFILL ☐ G. LANDFARM ☐ H. OPEN DUMP ☐ I. OTHER (SOBETY) OF COMMENTS V. CONTAINMENT ☐ A. ADEQUATE, SECURE ☐ B. MODERATE DE DESCRIPTION OF DRUMS, DIKING, LINERS, BARRIERS, ETC.					
☐ E. RCRA INTERIM STATUS ☐ F. SPCC PLAN ☐ G. STATE Spectry ☐ H. LOCAL Society ☐ I. OTHER SOCIETY ☐ J. NONE ☐ STORAGE DISPOSAL (CREEK AN INEX ADDITY) ☐ A. SURFACE IMPOUNDMENT ☐ B. PILES ☐ C. DRUMS, ABOVE GROUND ☐ D. TANK, ABOVE GROUND ☐ E. TANK, BELOW GROUND ☐ F. LANDFILL ☐ G. LANDFILL ☐ G. LANDFRAM ☐ H. OPEN DUMP ☐ I. OTHER ☐ I. OTHER ☐ SOCIETY OT COMMENTS V. CONTAINMENT ☐ A. ADEQUATE, SECURE ☐ B. MODERATE DESCRIPTION OF DRUMS, DIKING, LINERS, BARRIERS, ETC.		1			
G. STATE SOCKY) G. STATE SOCKY) G. LOCAL SOCKY) G. OTHER SOCKY) G. OTHER SOCKY) G. A. SURFACE IMPOUNDMENT G. DRUMS, ABOVE GROUND G. D. TANK, ABOVE GROUND G. LANDFILL G. LANDFRIL					
G. STATE (Specify) H. LOCAL Specify) J. NONE II. SITE DESCRIPTION II. STORAGE DISPOSAL (CINER OF INEL ADDITY) A. SURFACE IMPOUNDMENT B. PILES C. DRUMS, ABOVE GROUND C. TANK, ABOVE GROUND F. LANDFILL G. LANDFRILL G. LANDFRIM H. OPEN DUMP J. OTHER (Specify) TO COMMENTS V. CONTAINMENT D. A. ADEQUATE, SECURE C. B. MODERATE 12 DESCRIPTION OF DRUMS, DIKING, LINERS, BARRIERS, ETC.		i			
☐ H. LOCAL Society ☐ I. OTHER Society ☐ J. NONE II. SITE DESCRIPTION II STORAGE DISPOSAL (Check of that applies) ☐ A. SURFACE IMPOUNDMENT ☐ B. PILES ☐ C. DRUMS, ABOVE GROUND ☐ E. TANK, ABOVE GROUND ☐ F. LANDFILL ☐ G. LANDFRIL ☐ G. LANDFRIL ☐ G. LANDFRIL ☐ I. OTHER — (Society) 7 COMMENTS V. CONTAINMENT ☐ A. ADEQUATE, SECURE ☐ B. MODERATE 2 DESCRIPTION OF DRUMS, DIKING, LINERS, BARRIERS, ETC.					
DI. OTHER (SOCCR) J. NONE II. SITE DESCRIPTION II. STORAGE DISPOSAL (CROCK OF THAN ADDITION) A. SURFACE IMPOUNDMENT B. PILES C. DRUMS, ABOVE GROUND D. TANK, ABOVE GROUND E. TANK, BELOW GROUND F. LANDFILL G. LANDFARM H. OPEN DUMP I. OTHER (SOCCRY) TO COMMENTS V. CONTAINMENT A. ADEQUATE, SECURE B. MODERATE 2 DESCRIPTION OF DRUMS, DIKING, LINERS, BARRIERS, ETC.					
J. NONE II. SITE DESCRIPTION II STORAGE DISPOSAL (CROCK AN INAK ADDITY) A. SURFACE IMPOUNDMENT B. PILES C. DRUMS, ABOVE GROUND D. TANK, ABOVE GROUND E. TANK, BELOW GROUND G. LANDFILL G. LANDFILL G. LANDFRAM H. OPEN DUMP I. OTHER ISDOCKY) TO COMMENTS V. CONTAINMENT A. ADEQUATE, SECURE DESCRIPTION OF DRUMS, DIKING, LINERS, BARRIERS, ETC. V. ACCESSIBILITY					
III. SITE DESCRIPTION IT STORAGE DISPOSAL ICHECK AND INAL ADDITY A. SURFACE IMPOUNDMENT B. PILES C. DRUMS, ABOVE GROUND D. TANK, ABOVE GROUND E. TANK, BELOW GROUND F. LANDFILL G. LANDFARM H. OPEN DUMP I. OTHER ISPECTY) TO COMMENTS V. CONTAINMENT A. ADEQUATE, SECURE B. MODERATE 12 DESCRIPTION OF DRUMS, DIKING, LINERS, BARRIERS, ETC.					
OR STORAGE DISPOSAL ICROCK OF THAIL ADDITION OF DRUMS, ABOVE GROUND A. SURFACE IMPOUNDMENT B. PILES C. DRUMS, ABOVE GROUND D. TANK, ABOVE GROUND E. TANK, BELOW GROUND F. LANDFILL G. LANDFARM H. OPEN DUMP I. OTHER ISPOCRY) OF COMMENTS V. CONTAINMENT A. ADEQUATE, SECURE DESCRIPTION OF DRUMS, DIKING, LINERS, BARRIERS, ETC. V. ACCESSIBILITY	¥		VŁ.		
A. SURFACE IMPOUNDMENT B. PILES C. DRUMS, ABOVE GROUND D. TANK, ABOVE GROUND E. TANK, BELOW GROUND F. LANDFILL G. LANDFARM H. OPEN DUMP I. OTHER (Specify) OT COMMENTS V. CONTAINMENT B. MODERATE DESCRIPTION OF DRUMS, DIKING, LINERS, BARRIERS, ETC.	NIT OF MEASURE	E 04 TRI	EATMENT Check of	that appryl	05 OTHER
C. DRUMS, ABOVE GROUND D. TANK, ABOVE GROUND E. TANK, BELOW GROUND F. LANDFILL G. LANDFARM H. OPEN DUMP I. OTHER ISOCCHY) OT COMMENTS V. CONTAINMENT D. CONTAINMENT E. A. ADEQUATE, SECURE DESCRIPTION OF DRUMS, DIKING, LINERS, BARRIERS, ETC. V. ACCESSIBILITY		10.	NCENERATION		į
D. TANK, ABOVE GROUND E. TANK, BELOW GROUND F. LANDFILL G. LANDFARM H. OPEN DUMP I. OTHER (Specify) TO COMMENTS OF CONTAINMENT A. ADEQUATE, SECURE DESCRIPTION OF DRUMS, DIKING, LINERS, BARRIERS, ETC.			UNDERGROUND	INJECTION	A. BUILDINGS ON SITE
E. TANK, BELOW GROUND F. LANDFILL G. LANDFARM H. OPEN DUMP I. OTHER ISOCCHY TO COMMENTS V. CONTAINMENT A. ADEQUATE, SECURE DESCRIPTION OF DRUMS, DIKING, LINERS, BARRIERS, ETC. V. ACCESSIBILITY	5 GAL	1	CHEMICAL/PHY		1 1
F. LANDFILL G. LANDFARM H. OPEN DUMP I. OTHER ISSOCIATION TO COMMENTS V. CONTAINMENT DI CONTAINMENT OF WASTES (Check ane) A. ADEQUATE, SECURE DESCRIPTION OF DRUMS, DIKING, LINERS, BARRIERS, ETC. V. ACCESSIBILITY		□ 0.1	BIOLOGICAL		
G. LANDFARM H. OPEN DUMP II. OTHER ISpectly) OT COMMENTS V. CONTAINMENT OF CONTAINMENT A. ADEQUATE, SECURE DESCRIPTION OF DRUMS, DIKING, LINERS, BARRIERS, ETC. V. ACCESSIBILITY			WASTE OIL PRO		06 AREA OF SITE
C H. OPEN DUMP I. OTHER ISpecify) OF COMMENTS V. CONTAINMENT OF CONTAINMENT A. ADEQUATE, SECURE C B. MODERATE OF DESCRIPTION OF DRUMS, DIKING, LINERS, BARRIERS, ETC. V. ACCESSIBILITY			SOLVENT RECO	_	APPROX 1.5
(Social) OF COMMENTS OF CONTAINMENT OF CONT			OTHER RECYCL OTHER	ING/HECOVERY	AGE (AG
V. CONTAINMENT OT CONTAINMENT OT CONTAINMENT OF WASTES (Chock are) OT A. ADEQUATE, SECURE OT B. MODERATE OT DESCRIPTION OF DRUMS, DIKING, LINERS, BARRIERS, ETC.			• · · · c. · <u> </u>	(Specify)	
OI CONTAINMENT OF WASTES (Chock one) A. ADEQUATE, SECURE B. MODERATE DE DESCRIPTION OF DRUMS, DIKING, LINERS, BARRIERS, ETC. V. ACCESSIBILITY					,
A. ADEQUATE, SECURE B. MODERATE DZ DESCRIPTION OF DRUMS, DIKING, LINERS, BARRIERS, ETC. V. ACCESSIBILITY					
D2 DESCRIPTION OF DRUMS, DIKING, LINERS, BARRIERS, ETC. V. ACCESSIBILITY					
V. ACCESSIBILITY	□ c .	INADEQU	IATE, POOR	D. INSEC	URE, UNSOUND, DANGEROUS
01 WASTE EASILY ACCESSIBLE: YES NO 02 COMMENTS					
VI. SOURCES OF INFORMATION (Cité specific references, é.g. siate fré	•				
	1. sample analysis, ri	eportsi			
	S. samble analysis, //	eponti			



POTENTIAL HAZARDOUS WASTE SITE SITE INSPECTION REPORT PART 5 - WATER, DEMOGRAPHIC, AND ENVIRONMENTAL DATA I. IDEN O'L STATI

	<u> </u>
I. IDENT	IFICATION
OI STATE	DALO 2 00

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VI. ENVIRONMENTAL INFORMATION O1 PERMEABILITY OF UNSATURATED ZONE (Check one) □ A, 10⁻⁶ - 10⁻⁶ cm/sec □ B, 10⁻⁴ - 10⁻⁶ cm/sec □ C, 10⁻⁴ - 10⁻³ cm/sec □ D, GREATER THAN 10⁻³ cm/sec 02 PERMEABILITY OF BEDROCK (Check one) A. IMPERMEABLE (Less than 10⁻⁶ crivsec) ☐ B. RELATIVELY IMPERMEABLE ☐ C. RELATIVELY PERMEABLE ☐ D. VERY PERMEABLE (10⁻⁴ - 10⁻⁴ cm/sec) (Greater man 10⁻² cm/sec) (Greater man 10⁻² cm/sec) (Greater Man 10-2 cm/sec) 04 DEPTH OF CONTAMINATED SOIL ZONE 03 DEPTH TO BEDROCK 05 SOIL pH _(ft) OS NET PRECIPITATION 07 ONE YEAR 24 HOUR RAINFALL OB SLOPE SITE SLOPE DIRECTION OF SITE SLOPE, TERRAIN AVERAGE SLOPE _(in) 09 FLOOD POTENTIAL 10 ☐ SITE IS ON BARRIER ISLAND, COASTAL HIGH HAZARD AREA, RIVERINE FLOODWAY SITE IS IN ____ __ YEAR FLOODPLAIN 1.1 DISTANCE TO WETLANDS (5 acre minumum) 12 DISTANCE TO CRITICAL HABITAT (or engangered species) **ESTUARINE** OTHER В. . (mi) ENDANGERED SPECIES: _ 13 LAND USE IN VICINITY DISTANCE TO: RESIDENTIAL AREAS; NATIONAL/STATE PARKS, FORESTS, OR WILDLIFE RESERVES AGRICULTURAL LANDS COMMERCIAL/INDUSTRIAL PRIME AG LAND AG LAND 1 201 (mi) ____ (mi) ___ (mi) D. ____ __ (mi) 14 DESCRIPTION OF SITE IN RELATION TO SURROUNDING TOPOGRAPHY

TERRAIN IS SLIGHTLY HILLY. THE SITE IS LOUTED ON THE PLATEAU OF A MEDIUM-SIZED HILL

VII. SOURCES OF INFORMATION (CAe specific references, e.g., state fres, samele analysis, reports)

US 45 TOPO MAP

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POTENTIAL HAZARDOUS WASTE SITE SITE INSPECTION REPORT PART 7 - OWNER INFORMATION

I. IDENTIFICATION

1. STATE 102 SITE NUMBER

GA W0299

II. CURRENT OWNER(S)			PARENT COMPANY (# applicable)		
1 NAME		02 D+8 NUMBER	OB NAME	0	9 D+8 NUMBER
RICHARD ELLEN BURG &	RUSTE E				
RICHARD ELLEN BURG G 3 STREET ADDRESS (PO BOX. APD P. OSC.) 83 WALTON ST N SCITY A TLANTA	111	04 SIC COD€	10 STREET ADDRESS (P.O. Box, RFD # .	He.)	11 SIC CODE
sary	OG STATE	07 ZIP CODE	12 CITY	13 STATE 1	4 ZIP CODE
ATLANTA	64	30318			
) NAME		02 D+8 NUMBER	08 NAME	0	9 D+8 NUMBER
3 STREET ADORESS (P.O. Bost, AFD P. etc.)		04 SIC CODE	10 STREET ADDRESS (P O. Bos. AFD F. e	HE.J	11 SIC CODE
D5 CITY	06 STATE	07 ZIP CODE	12 CITY	13 STATE 1	4 ZIP COD€
D1 NAME		02 D+B NUMBER	OS NAME		9 D+8 NUMBER
03 STREET ADDRESS (P.O. Boz. RFO F. etc.)		04 SIC CODE	10 STREET ADDRESS (P.O. Box, AFD #.	He.J	11 SIC CODE
DS CITY	06 STATE	07 ZIP CODE	12 CITY	13 STATE 1	4 ZIP CODE
DI NAME		02 D+8 NUMBER	08 NAME		9 D+8 NUMBER
03 STREET ADDRESS (P.O. Box. RFD P. etc.)		04 SIC CODE	10 STREET ADDRESS (P.O. Box. AFD F.	HC.)	11 SIC CODE
05 CITY	06 STATE	07 ZIP CODE	12 CITY	13 STATE	14 ZIP CODE
III. PREVIOUS OWNER(S) (List most recent	Mran		IV. REALTY OWNER(S) (# sopings)	No. No. (Pocant Intil)	
RALPA PREDDY		02 D+8 NUMBER	01 NAME		2 0+8 NUMBER
DISSTREET ADDRESS (P.O. BOX. RFD F. OIC.)		04 SIC CODE	03 STREET ADDRESS IP O. Box, RFD .	elc.)	04 SIC COD
DS CITY	OSSTATE	O7 ZIP CODE	OS CITY	06 STATE	O7 ZIP CODE
01 NAME	\ \	02 D+6 NUMBER	OT NAME		02 D+8 NUMBE
03 STREET ADDRESS (P O Box, AFD #, erc.)	· · · · · · · · · · · · · · · · · · ·	04 SIC CODE	03 STREET ADDRESS IP O. Box, RFD +.	MC.)	04 SIC COD
05 CITY	06 STATE	07 ZIP COD€	OS CITY	06 STATE	07 ZIP CODE
DI NAME		02 D+8 NUMBER	OI NAME		02 D+8 NUMBE
D3 STREET ADDRESS (P O. Boat, RFD #. exc.)		04 SIC CODE	03 STREET ADDRESS (P O Box. AFD P.	HC.)	04 SIC COO
DSCITY	06 STATE	07 ZIP CODE	05 CITY	06 STATE	OT ZIP CODE

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POTENTIAL HAZARDOUS WASTE SITE SITE INSPECTION REPORT PART 9 - GENERATOR/TRANSPORTER INFORMATIO

-	I. IDENT	IFICATION	ON
	O1 STATE	OZ SITE N	

06 STATE	04 SIC CODE 07 ZIP CODE			
	07 ZIP COD€		·	
	07 ZIP COD€		·	
			· · · · · · · · · · · · · · · · · · ·	
	02 D+8 NUMBER			
	02 D+8 NUMBER	Tax Company		
		01 NAME	02	D+8 NUMBER
	04 SIC CODE	03 STREET ADDRESS (P.O. Box. A	IFD #. etc.)	04 SIC CODE
D6 STATE	07 ZIP CODE	оѕ спу	C6 STATE O	ZIP CODE
	02 D+8 NUMBER	01 NAME		D+8 NUMBER
	04 SIC CODE	03 STREET ADDRESS (P 0. Box.)	RFO e. esc.)	04 SIC CODE
36 STATE	07 ZIP CODE	05 CITY	D6 STATE D	ZIP CODE
				
	02 D+8 NUMBER	01 NAME	o	D+8 NUMBER
	04 SIC CODE	03 STREET ADDRESS (P.O. Box. A	1FO #, etc.)	04 SIC CODE
06 STATE	07 ZIP COOE	05 CITY	OS STATE O	7 ZIP COD€
	02 D+B NUMBER	01 NAME	0	2 D+B NUMBER
	04 SIC CODE	C3 STREET ADDRESS (P O. Box.	RFO #, etc.)	04 SIC CODE
06 STATE	07 ZIP CODE	05 CITY	DE STATE O	7 ZIP CODE
	O6 STATE	02 D+8 NUMBER 04 SIC CODE 05 STATE 07 ZIP CODE 02 D+8 NUMBER 04 SIC CODE	02 D+8 NUMBER 01 NAME 04 SIC CODE 03 STREET ADDRESS (P.O. Box.) 05 CITY 06 STATE 07 ZIP CODE 03 STREET ADDRESS (P.O. Box.) 08 STATE 07 ZIP CODE 05 CITY 09 STATE 07 ZIP CODE 05 CITY 00 STATE 07 ZIP CODE 05 CITY 00 STATE 07 ZIP CODE 05 CITY 00 STATE 07 ZIP CODE 05 CITY 01 NAME	02 D+8 NUMBER

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POTENTIAL HAZARDOUS WASTE SITE SITE INSPECTION REPORT

Ī	I. IDEN	TIFICAT	TON	-
	OI STATE		NUMBER 2 0	-)

YCPA	PART 10 - PAST RESPONSE ACTIVITIES	64 Wo 299
PAST RESPONSE ACTIVITIES		
01 G R BARRIER WALLS CONSTRUCTED 04 DESCRIPTION	02 DATE	03 AGENCY
01 C S. CAPPING/COVERING 04 DESCRIPTION	02 DATE	03 AGENCY
01 T. BULK TANKAGE REPAIRED 04 DESCRIPTION	02 DATE	03 AGENCY
01 C U. GROUT CURTAIN CONSTRUCTED 04 DESCRIPTION	02 DATE	03 AGENCY
01 T. V. BOTTOM SEALED 04 DESCRIPTION	02 DATE	03 AGENCY
01 C W. GAS CONTROL 04 DESCRIPTION	02 DATE	03 AGENCY
01 □ X. FIRE CONTROL 04 DESCRIPTION	02 DATE	03 AGENCY
01 ☐ Y. LEACHATE TREATMENT 04 DESCRIPTION	02 DATE	03 AGENCY
01 T. Z. AREA EVACUATED 04 DESCRIPTION	O2 DATE	03 AGENCY
01 T 1. ACCESS TO SITE RESTRICTED 04 DESCRIPTION	O2 DATE	03 AGENCY
01 = 2. POPULATION RELOCATED 04 DESCRIPTION	O2 DATE	03 AGENCY
01 X 3. OTHER REMEDIAL ACTIVITIES 04 DESCRIPTION	02 DATE _8-24-87	03 AGENCY CITY OF COVING 7011

III. SOURCES OF INFORMATION (Cite specific references e.g., state files, sample analysis, reports)

≎ EPA	POTENTIAL HAZARDOUS WASTE SITE PRELIMINARY ASSESSMENT PART 1 - SITE INFORMATION AND ASSESSMENT			L	L IDENTIFICATION OLSTATE 02 SITE NUMBER GA WO 299					
. SITE NAME AND LOCATION										
SITE NAME ILUGAL common, or describing name	of 250)		02 STREE	T, ROUTE NO	., OA SPE	IFIC LOC	ATION IDEN	ITIFIER		
SPECTRUM PR	117/16		41	32	ひ、ら		HIGH	-IWA-	127	8
COVINGTON	`		GA	3020	E 06 C				O7 COUN CODE	
23 36 15	83 5	203					<u> </u>			
FROM ATLANTA TAKE THE COUNTY ON U.S. WEST STREET RESPONSIBLE PARTIES	INTERSTAT	TAKE U.	5.27	SEAT	7 M	PRO)	(I M	ILE	W	
I NESPUNSIBLE PARTIES			Too expec	T (Busmoss, m						
PICHARO ELLENA	20066	DIKTEE)	1	33 W	•		57	٨,	W.	
3 CITY	3079	KUSY EE /	04 STATE	05 ZIP COD			HONE NUN			
ATLANTA			GA	303			525			
OPERATOR (If brown and different from owner)				1 1 ZIP COD	uling, residen	nell	MONE NUN			
						()				
TYPE OF OWNERSHIP (Check and) A. PRIVATE B. FED TF. OTHER: TRUST	eral: E <i>E Ship</i> - Ri	(Agency name) HARN ELLEN	3V2 6-		STATE		YTAU	□ E. MU	NICIPAL	
OWNER-OPERATOR NOTIFICATION ON FILE A. RCRA 3001 DATE RECEIVED:	MONTH DAY YEAR	B. UNCONTROLI	LED WAST	E SITE (CERC	LA 103 ej	DATE RI	ECEIVED:	MON1> 0	/ AV VEAR	C. 1
V. CHARACTERIZATION OF POTEN		ch of thei spory)	<u> </u>							
EVES DATE 8 24, 9	BO MAE	PA & B. EP.	A CONTRA	CTOR	X c.s	TATE	□ D		CONTRACT	OR —
•	CONTE	RACTOR NAME(S):	ROY	F. W	ES 7	2M	1300			
SITE STATUS (Chock one) D. A. ACTIVE S. INACTIVE D		03 YEARS OF OPER		AR 6	NOWG YEAR		¥	INKNOW	N	
CTIRO MIUM, LEAD		OR ALLEGED					ALCO	HUL		

paveo area where ijrums are stable

V. P	Ri	OR	ITY	A	SS	ES:	SM	EN'	ľ

01 PRIORITY FOR INSPECTION (C	hook and. If high or medium is abothe	6. complete Parl 2 - Wasto Informa	uan and Part 3 - Description of Hazardous Condowns and Incidents)	
O A HIGH	E B. MEDIUM	C C. LOW	O. NONE	

YL INFORMATION AVAILABLE FROM		·
DI CONTACT	02 OF (Agency/Organization)	03 TELEPHONE NUMBER
ROMOIVA JKLEIN	GA DEPT OF NATURAL RESUMPLES	(404) 636 2836

OS AGENCY ROY F. WESTON 1804) 3524147 04 PERSON RESPONSIBLE FOR ASSESSMENT JOHN ASHLEY BROWN

636 2836 OB DATE

9 29 87

MONTH DAY YEAR

EPA FORM 2070-12 (7-81)

9	EF	PA
~	-	

POTENTIAL HAZARDOUS WASTE SITE PRELIMINARY ASSESSMENT PART 2 - WASTE INFORMATION

	IFICATION
OLSTATE A	WUZ99

ALL	7		PART 2-WAST	E INFORMATION	1	4A WE	799
II. WASTES	TATES, QUANTITIES, AN	ID CHARACTER	ISTICS				
D1 PHYSICAL S A. SOLID B. POWDE C. SLUDGE C. D. OTHER	NOER, FINES DEF. LIQUID TONS U. G. GAS CUBIC YARDS HER		MA. TOXIC J. B. CORRO G. C. CORRO U. D. PERSIS	ACTIVE 📜 G. FLAMI	SLE LI HIGHLY' TIOUS LI J. EXPLOS MABLE LI K. REACTI	IVE VE PATIBLE	
	(Specdy)	NO. OF DRUMS	HTKO 2 /3	<u>l</u>			
III. WASTE T		T	T	. T			
SLU	SUBSTANCE N	AME		GALLON S		0% ORUMS AR	
OLW	OILY WASTE		APPROX 1300	M/ILLON >	HSSUMBUS /	Ja VAKOTIIS INK	F 52 00 6C
SOL	SOLVENTS		APPROXISOU	GALLUNS	ASSUMUELO	% DRUMS A	24 54 44
PSD	PESTICIDES		TYT RUI ISO	Criston	TASSUMAL D	70 DKUMINA	LE SUL VED
осс	OTHER ORGANIC CH	HEMICALS			 		
юс	INORGANIC CHEMIC		 				
ACD	ACIDS						
BAS	BASES						
MES	HEAVY METALS						
IV. HAZARD	OUS SUBSTANCES (500 A	apandis for masi fraquer	Hy saed CAS Numbers)		<u></u>		
01 CATEGORY	OZ SUBSTANCE NAME		03 CAS NUMBER	04 STORAGE/DIS	POSAL METHOD	05 CONCENTRATION	DE MEASURE OF
	MYLENES		1330-20-7	DRUMS, OP	en arums	88,37	PPM
	CHROMIUM		7440-47-3			14.87	ppm
L EAD		7939-92-1					
	1 SOPROPANOL		67-63-0	DRU	<u>m5</u>		
	+ THESE	CONENTR	17/4/US ME	RE OBTA	NED PRUM	MBORATOR	9
			F SAMPLE:			DRUMS.	
V. FEEDSTO	CKS (See Appendix for CAS Numb	#W		<u> </u>			<u> </u>
CATEGORY			02 CAS NUMBER	CATEGORY	O1 FEEDST	OCK NAME	02 CAS NUMBER
FDS				FDS			
FDS			 	FDS	 		
FDS				FDS			· · · · · · · · · · · · · · · · · · ·
FDS				FDS			
VI. SOURCE	S OF INFORMATION ICH	apagets raferances, e.g	., store Mes, sample analysis.	reports ('		
VISU	al observat	10N, LAB	els on or	ums, LAB	ORAJORY A	VAL 1515	

\$EPA

POTENTIAL HAZARDOUS WASTE SITE PRELIMINARY ASSESSMENT

1. IDENTIFICATION

1. STATE OF SITE NUMBER

1. WO 299

PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

PART 3" DESCRIPTION OF	HAZANDOUS CONDITIONS AND INCIDENTS
IL HAZARDOUS CONDITIONS AND INCIDENTS	
01 TA. GROUNDWATER CONTAMINATION SOUTH OF 03 POPULATION POTENTIALLY AFFECTED: CONNACTOR	02 OBSERVED (DATE: 24-87) POTENTIAL ALLEGED 04 NARRATIVE DESCRIPTION
RAIN RUNGE FROM OPEN ORUMS A	WOSPILLED MATERIAL ON SITE MUST LIKELY
WILL RUIT INTO DRIED INDUN IREA	EX WHICH IS A DRAINAGE PATH WHICH TRIVELS
SOUTH AND DRIES UP DURING	PERIODS OF LITTLE RAIN
01 B. SURFACE WATER CONTAMINATION SOUTH OF 03 POPULATION POTENTIALLY AFFECTED: COUNTY OF THE PROPERTY OF THE P	02 - OBSERVED (DATE: 8-2 4-87) POTENTIAL - ALLEGED OA NARRATIVE DESCRIPTION
RAIN RUIVORF FROM OPEN DRUM	IS AUD SPILLED MATGRIAL ON SITE WILL
MOST LIKELY MAKE ITS WAY	TO DRIED INDIAN GREEK
01 S.C. CONTAMINATION OF AIR 03 POPULATION POTENTIALLY AFFECTED: COUNTY 7 014	
EURPORATION OF SOLVENTS	(CAPRIERS) IN OPEN DRUMS
01 © D. FIRE/EXPLOSIVE CONDITIONS 03 POPULATION POTENTIALLY AFFECTED:	02 (1) OBSERVED (DATE:) (1) POTENTIAL (1) ALLEGED 04 NARRATIVE DESCRIPTION
01 ME. DIRECT CONTACT 03 POPULATION POTENTIALLY AFFECTED:	02 LI OBSERVED (DATE: 274-27) SUPOTENTIAL LI ALLEGED 04 NARRATIVE DESCRIPTION
MATERIAL IN OPEN DRUMS I	S EASILY ACCESSABLE TO PUBLIC
01 A F. CONTAMINATION OF SOIL COLL (ASSESSMENT)	02 0 OBSERVED (DATE: 8-24-83) U POTENTIAL CALLEGED 04 NARRATIVE DESCRIPTION
SPILLAGE IT MATERIAL ON	THE GROUND WAS OBSERVED BENEATH
	60NG INTO THE BUILDING
01 G. DRINKING WATER CONTAMINATION 03 POPULATION POTENTIALLY AFFECTED:	02 OBSERVED (DATE) POTENTIAL C ALLEGED 04 NARRATIVE DESCRIPTION
01 TH. WORKER EXPOSURE/INJURY 03 WORKERS POTENTIALLY AFFECTED:	02 - OBSERVED (DATE: 8-24-87) POTENTIAL - ALLEGED 04 NARRATIVE DESCRIPTION
IN THE EVENT OF A CLEAN	UP CARE SHOULD BE EXERCISED AS MANY OF
01 [] I. POPULATION EXPOSURE/INJURY 03 POPULATION POTENTIALLY AFFECTED:	02 OBSERVED (DATE:) POTENTIAL C ALLEGED 04 NARRATIVE DESCRIPTION
,₩ ,	1

POTENTIAL HAZARDOUS WASTE SITE

	TIFICATION
O1 STATE	02 SITE NUMBER
ViA	1 120299

PART 3 - DESCR	PRELIMINARY ASSESSMENT RIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS	OL STATE 02	NO299
L HAZARDOUS CONDITIONS AND INCIDEN		•	
01 S J. DAMAGE TO FLORA 04 NARRATIVE DESCRIPTION		D POTENTIAL	C) ALLEGED
01 D.K. DAMAGE TO FAUNA 04 NARRATIVE DESCRIPTION (PREASE PARTIE) of RECE		□ POTENTIAL	O ALLEGED
01 D L CONTAMINATION OF FOOD CHAIN 04 NARRATIVE DESCRIPTION	02 OBSERVED (DATE:)	D POTENTIAL	□ ALLEGED
MANY DRUMS ARE OVER TURNE		D POTENTIAL	MALLEGED SOME
01 D. DAMAGE TO OFFSITE PROPERTY 04 NARRATIVE DESCRIPTION		D POTENTIAL	□ ALLEGED
04 NARRATIVE DESCRIPTION	M SITE WILL BE CAPRIED BY ST	D POTENTIAL	NN Z
D1 C P. ILLEGAL/UNAUTHORIZED DUMPING D4 NARRATIVE DESCRIPTION	02 C OBSERVED (DATE:)	O POTENTIAL	□ ALLEGED
OS DESCRIPTION OF ANY OTHER KNOWN, POT	TENTIAL, OR ALLEGED HAZARDS	·	
L TOTAL POPULATION POTENTIALLY AFF	FECTEO:		
/. COMMENTS			
7. SOURCES OF INFORMATION (Care appendix ref)	in the same that same the same to the same		
		ME DEIDA	70
RP'S ACQUISITION, RANDY BROWN) EWY STRICKLAND - CVILY OF GU FRANK TURNER - GUNGSON	NAT RESOURCES, COUINGTON NEWS-FORMER OW - SOUTHERS TERN LASS, RANDY BROWN-SOUTH INGOUN WATER WORKS, DON FLOYD-FIRE MARS	ELYLL-COVII	s, No <i>to</i> n,

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+ •	THILL		4

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- III. DISCUSSION OF SAMPLING ACTIVITES
- IV. METHODOLOGY AND QUALITY CONTROL
- V. DISCUSSION OF ANALYTICAL RESULTS

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Figure 2 - Site Map Showing Sample Locations

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Annex A - Lab Results

Annex B - QA/QC Data

Annex C - Photographs

I. <u>INTRODUCTION</u>

The Region IV Technical Assistance Team (TAT) of Roy F. Weston, Inc. conducted an investigation and assessment of the Spectrum Printing Site between the 5th and 24th of August 1987. The investigation performed by J. A. Brown (project officer), J. C. Lan and J. Lathram was conducted at the request of the U. S. EPA Region IV in accordance with the provisions of Technical Direction Document (TDD) 04-8708-03.

Bill Klutz, Region IV EPA, and Ramona Klein of the Georgia Department of Natural Resources also participated in the investigation.

The purpose of this investigation is to document a release to the environment of a hazardous substance, pollutant or contaminant as mandated by Section 104(e) of the Comprehensive Environmental Response Compensation and Liability Act (CERCLA) as amended by the Superfund Amendments and Reauthorization Act of 1986 (SARA).

II. SITE CHARACTERIZATION

A. Site Location

The site described herein as Spectrum Printing is located in Covinton Georgia's commercial district at 4132 U.S. Highway 278. The coordinates of the site are latitude 33 degrees 36 minutes and 15 seconds and longitude 83 degrees 52 minutes and 3 seconds. The approximately 275 drums of interest are stockpiled on a paved area behind a medium sized industrial building formerly known as Spectrum Printing. A public road is contiguous to this paved area and from the road open drums containing printing process and waste materials are observable and accessable.

B. <u>History and Waste Disposal Practices</u>

From January 1987 until May 1987, the building at 4132 U.S. Highway 278 in Covington, Georgia was used as a printing company called Spectrum Printing. Spectrum Printing's owner Ralph Preddy filed for bankruptcy in May of 1987. Prior to January 1987, the building was used for the printing of a newspaper, The Covington News. The property is now in the trusteeship of The Law Firm of Richard Ellenburg of Atlanta.

There is no physical barrier to prevent access to the material in question and open drums are within 15 feet of a road (Annex C - Photographs). Additionally,

overturned and leaking drums have released their contents onto the paved area where they are staged. Discharged material was observed on the soil beneath the terminus of a pipe going into the building.

Since environmental releases of suspect compounds were observed on the site, the statutory authority of the Environmental Response, Compensation and Liability Act (CERCLA) was invoked in the form of sampling and analysis of substances involved to aid in determining if an immediate response is necessary to protect the public health and welfare and the environment.

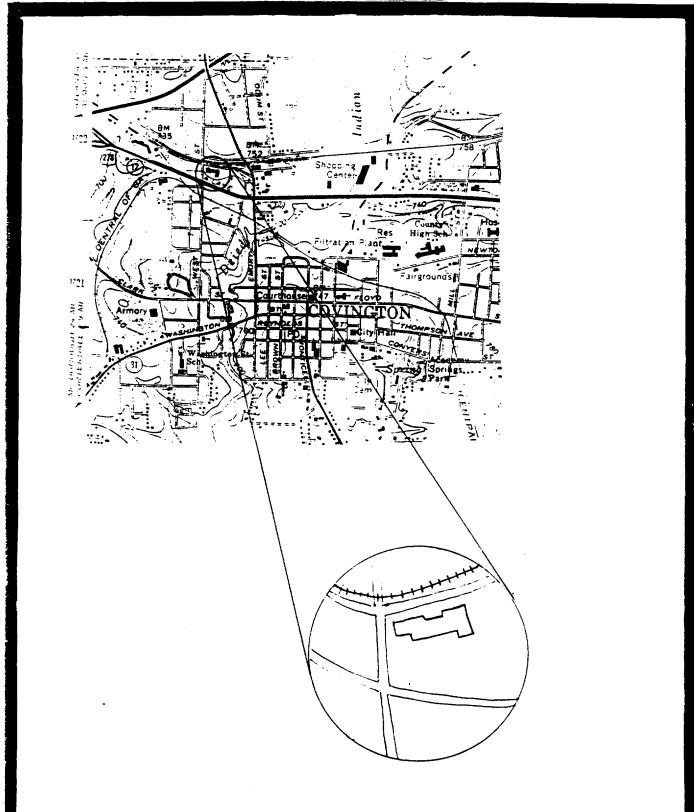
C. Potential for Migration of Wastes Offsite

Since the wastes in question are located on a paved surface in a municipal area, migration of contaminated rain runoff from the spillage and drums will be accellerated by the relatively impervious paved surfaces it is traveling on until it reaches a receiving stream. In this case the receiving stream would be dried Indian Creek which flows south.

The city of Covington's water filtration plant is located within seven tenths of a mile (0.7) east of the Spectrum Printing site. The plant has a reservoir which is recharged with water piped from the Alcovy River which is several miles north of Covington. Since the flow of the likely drainage path for the site flows south and the filtration plant receives its water from several miles north, the chance of contamination of the city's water supply from the Spectrum Printing site is minimal.

III. DISCUSSION OF SAMPLING ACTIVITIES

During the conduct of this investigation five composite samples of drummed and spilled material from the Spectrum Printing site were obtained and analyzed. The five composite samples were obtained as follows: two were from open drums containing black tarry material, one was composited from drums containing relatively pure red ink, one was composited from material spilled on the paved drum staging area and one was a composite of contaminated soil from an area around the terminus of a pipe going into the building (Figure 2 - Sampling Locations). Table I presents the sample codes, description of sample types, composite aliquots and analytical parameters. Laboratory analysis results are presented in Annex A and Quality Assurance/Quality Control Data for the laboratory analysis is presented in Annex B.



TITLE: FIGURE 1 SITE LOCATION MAP	MAP:
	SCALE:NONE
OCATION: SPECTRUM PRINTING SITE.	ORIGINATOR:
COVINGTON, GEORGIA	DATE:TDD:

WESTER!

	GEORGIA RAILROAD
_ _	OLD ATLANTA ROAD COMPOSITE SCIL SAMP SPCS-01 TAKEN HER
STREET	
WEST	COMPOSITE SAMPLES SPSC-01, SP-SC-02, SP-IC-01, AND SP-SA-01 TAKEN FROM DRUMS IN THIS AREA
	278 N

TITLE: FIGURE 2 SITE MAP SHOWING	MAP:
SAMPLE LOCATIONS	SCALE:NONE
LOCATION: SPECTRUM PRINTING SITE,	ORIGINATOR:
COVINGTON, GEORGIA	DATE:TDD:

IV. METHODOLOGY AND QUALITY CONTROL

A. <u>Methodology</u>

All sample collections, sample preservation and chain of custody procedures used during this investigation were in accordance with the Environmental Services Division (ESD) procedures for field sampling and the sampling plan prepared under TDD #04-8708-03-1225.

Volatile organic analysis of the samples was performed by Southeast Laboratories in Atlanta using EPA methods 8010 and 8020 as set forth in EPA test methods for Evaluating Soild Wastes SW 846, 2nd edition revised 1985.

Analysis for priority pollutant metals was performed by Southeast Laboratories of Atlanta using the applicable methods set forth in EPA Methods for Evaluating Solid Waste; SW 846, 3rd edition November 1986.

B. Quality Control

Quality Control of the lab data presented in this report was performed by Southeast Laboratories and was in accordance with the Quality Control procedures specified in the EPA methods used.

Recovery rates for spikes were within the ranges specified in the EPA methods used. Contamination levels revealed by blanks were shown to be insignificant.

V. <u>DISCUSSION OF ANALYTICAL RESULTS</u>

Analysis for metals showed that sample SP-SC-01 had 14.8 ppm chromium and 8.3 ppm lead; sample SP-SC-02 had 9.1 ppm chromium and 12.7 ppm lead.

Volatile organic analysis of samples revealed the following levels of xylenes: SP-SC-01 26.1 ppm, SP-SC-02 88.3ppm, SP-IC-01 14.6 ppm, SP-SA-01 1.36 ppm, SP-CS-01 <50 ppb.

TABLE I
SAMPLE DESCRIPTIONS

Sample Code	Description	Composite Aliquots *	Analytical Parameter
SP-SC-01	Composite of sludgy materials from several drums	01, 02, 03, 04, 05	Metals VOA
SP-SC-02	Composite of sludgy materials from several drums	01, 02, 03, 04, 05	Metals VOA
SP-IC-01	Composite of red inks from several drums	01, 02, 03 04	VOA
SP-SA-01	Composite of material spilled on paved area	several locations on paved area	VOA
SP-CS-01	Composite of soil sample from area around the terminus of a pipe going into the building	Composite soil	VOA

^{*} Where aliquots are designated by numbers these numbers represent individual drums from which the samples were taken.

ANNEX A Results of Labortory Analysis



SEPTEMBER- 10, 1987

LABORATORY REPORT

WESTON SPER 100 ATLANTA TECHNOLOGY CENTER SUITE 120. BLDG. 100 1575 NORTHSIDE DRIVE, N. W. ATLANTA, GEORGIA 30318

REPORT No. 25083

ATTN: MR. HARRY M. JONES/ASHLEY BROWN

SAMPLE MARKING: SPSC01 8-24-87, 0950.

TEST PROCEDURE: EPA TEST METHODS FOR EVALUATING SOLID WASTE, NOVEMBER 1986, SW-846, 3RD ED., TESTED ON PERKIN-ELMER 460 AND 1100 ATOMIC ABSORPTION SPECTROPHOTOMETER.

RESULTS

	MG/KG
ARSENIC	<0.50
BERYLLIUM	<3
CADMIUM	<3
CHROMIUM	14.8
COPPER	270
LEAD	8.3
MERCURY	<0.05
NICKEL	<5
SELENIUM	<0.50
SILVER	<10
THALLIUM	<25
ZINC	7.3
CYANIDE	2.5

NOTE: TEST PROCEDURES ENCLOSED.

RESPECTFULLY SUBMITTED,

SOUTHEAST LABORATORIES, INC.

RANDY BROWN

RB:MS



SEPTEMBER 10, 1987

LABORATORY REPORT

WESTON SPER 100 ATLANTA TECHNOLOGY CENTER SUITE 120, BLDG. 100 1575 NORTHSIDE DRIVE, N. W. ATLANTA, GEORGIA 30318 ATTN: MR. ASHLEY BROWN

REPORT No. 25083-1

SAMPLE MARKING: SPSC 01-02,03,04,05, 8-24-87 0950.

TEST PROCEDURE: HALOGENATED AND AROMATIC VOLATILE ORGANICS BY EPA METHODS 8010 AND 8020 AS SET FORTH IN TEST METHODS FOR EVALUATING SOLID WASTE SW-846, 2ND EDITION REVISED 1985.

RESULTS

MICROG	RAM/KILOGRAM (PPB)		MICROGRAM/KILOGRAM (PPB)
	(669)		(PP6)
BROMODICHLOROMETHANE	<5	METHYLENE CHLORIDE	13
Bromoform	<5	TETRACHLOROETHENE	<5
BROMOMETHANE	<5	1,1,1 TRICHLORGETHANE	
CARBON TETRACHLORIDE	<5	1,1,2 TRICHLOROETHANE	
CHLOROBENZENE	<5	TRICHLORGETHENE	<5
CHLOROETHANE	<5	TRICHLOROFLUOROMETHAN	
2-CHLOROETHYLVINYL ETHER	₹ <5	VINYL CHLORIDE	< 5
CHLOROFORM	<5		
CHLOROMETHANE	<5	BENZENE	179
DIBROMOCHLOROMETHANE	<5	TOLUENE	241
1,2 DICHLOROBENZENE	<5	ETHYLBENZENE	<50
1,3 DICHLOROBENZENE	<5	XYLENES	26.100
1,4 DICHLOROBENZENE	<5		
DICHLORODIFLUOROMETHANE	<5		
1,1 DICHLORGETHANE	<5		
1,2 DICHLOROETHANE	<5		
1,1 DICHLOROETHENE	<5		
T-1,2 DICHLOROETHENE	<5		
1,2 DICHLOROPROPANE	<5		
C-1.3 DICHLOROPROPENE	<5		
T-1,3 DICHLOROPROPENE	<5		
1,1,2,2 TETRACHLOROETHAN			

RESPECTFULLY SUBMITTED,

SOUTHEAST LABORATORIES, INC.



SEPTEMBER 10, 1987

LABORATORY REPORT

WESTON SPER 100 ATLANTA TECHNOLOGY CENTER SUITE 120. BLDG. 100 1575 NORTHSIDE DRIVE, N.W. ATLANTA, GEORGIA 30318

REPORT No. 25083

ATTN: MR. HARRY M. JONES/ASHLEY BROWN

SAMPLE MARKING: SPSC02 8-24-87 1000, SPSC-02-01,02,03,

04,05.

TEST PROCEDURE: EPA TEST METHODS FOR EVALUATING SOLID WASTE,

NOVEMBER 1986, SW-846, 3RD ED., TESTED ON PERKIN-ELMER 460 AND 1100 ATOMIC ABSORPTION

SPECTROPHOTOMETER.

RESULTS

MG/KG
<0.50
<3
<3
9.1 -
80.8
12.7
<0.05
<5
<0.50
<10
<25
20.7
14

RESPECTFULLY SUBMITTED,

SOUTHEAST LABORATORIES, INC.



POTOTIES INC. 1490 Mecasin St. N.W. Attonto. Go. 20209 (404) 872-1896 (404 871-1880)

SEPTEMBER 10, 1987

WESTON SPER

LABORATORY REPORT

100 ATLANTA TECHNOLOGY CENTER

SUITE 120, BLDG. 100

1575 NORTHSIDE DRIVE, N. W.

ATLANTA, GEORGIA 30318

REPORT No. 25083-2

ATTN: MR. ASHLEY BROWN

SAMPLE MARKING: SPSC 02-01,02,03,04,05, 8-24-87 1000.

TEST PROCEDURE: EPA METHOD 601 AND 602 AS SET FORTH IN TEST METHODS FOR ORGANIC CHEMICAL ANALYSIS OF MUNICIPAL AND INDUSTRIAL WASTE EPA 600/4-82-027 JULY 1982.

RESULTS

	MICROGRAM/LITER (PPB)		MICROGRAM/LITER (PPB)
BROMODICHLOROMETHANE BROMOFORM BROMOMETHANE CARBON TETRACHLORIDE CHLOROBENZENE CHLOROETHANE 2-CHLOROETHYLVINYL ETH CHLOROFORM CHLOROMETHANE DIBROMOCHLOROMETHANE 1,2-DICHLOROBENZENE 1,3-DICHLOROBENZENE 1,4-DICHLOROBENZENE DICHLOROBIZENE DICHLOROBIZENE 1,1-DICHLOROBETHANE 1,1-DICHLOROETHANE 1,2-DICHLOROETHANE	(PPB) <5 <5 <5 <5 <5 <5 <5 <5 <5 <5 <5 <5 <5	METHYLENE CHLORIDE TETRACHLORGETHENE 1,1,1-TRICHLOROETHANE 1,1,2-TRICHLOROETHANE TRICHLOROETHENE TRICHLOROFLUOROMETHAN VINYL CHLORIDE BENZENE TOLUENE ETHYLBENZENE XYLENES	(PP8) 9 <5 <5 <5 <5 <5
1,1-DICHLOROETHENE T-1,2-DICHLOROETHENE 1,2-DICHLOROPROPANE C-1,3-DICHLOROPROPENE T-1,3-DICHLOROPROPENE 1,1,2,2-TETRACHLOROETH	<5 <5 <5 <5 <5 <5 <5 ANE <5		

RESPECTFULLY SUBMITTED,

SOUTHEAST LABORATORIES, INC.

RANDY BROWN

RB:08



SEPTEMBER 10, 1987

LABORATORY REPORT

WESTON SPER 100 ATLANTA TECHNOLOGY CENTER SUITE 120, BLDG. 100 1575 NORTHSIDE DRIVE, N. W. ATLANTA, GEORGIA 30318

REPORT No. 25083-3

ATTN: MR. ASHLEY BROWN

SAMPLE MARKING: SPIC 01-01,02,03,04, 8-24-87 1005.

TEST PROCEDURE: EPA METHOD 601 AND 602 AS SET FORTH IN TEST METHODS FOR ORGANIC CHEMICAL ANALYSIS OF MUNICIPAL AND INDUSTRIAL WASTE EPA 600/4-82-027 JULY 1982.

RESULTS

	MICROGRAM/LITER (PPB).		MICROGRAM/LITER (PPB)
BROMODICHLOROMETHANE BROMOFORM	<5	METHYLENE CHLORIDE TETRACHLOROETHENE	<5 <5
BROMOMETHANE CARBON TETRACHLORIDE	<5 <5 <5	1,1,1-TRICHLOROETHANE 1,1,2-TRICHLOROETHANE	8,000
CHLOROBENZENE CHLOROETHANE	<5 <5	TRICHLOROETHENE TRICHLOROFLUOROMETHAN	<5
2-CHLOROETHYLVINYL ETP CHLOROFORM		VINYL CHLORIDE	<5
CHLOROMETHANE DIBROMOCHLOROMETHANE	<5 <5	BENZENE TOLUENE	<50 2,520
1,2-DICHLOROBENZENE 1,3-DICHLOROBENZENE 1,4-DICHLOROBENZENE	<5 <5	ETHYLBENZENE Xylenes	460 14,600
DICHLORODIFLUGROMETHAN 1,1-DICHLOROETHANE	<5 YE <5 <5		
1,2-DICHLOROETHANE 1,1-DICHLOROETHENE	<5 17		
T-1,2-DICHLORDETHENE 1,2-DICHLORDPROPANE	<5 <5		
C-1,3-DICHLOROPROPENE T-1,3-DICHLOROPROPENE 1,1,2,2-TETRACHLOROETI	<5 <5 HANE <5		

RESPECTFULLY SUBMITTED,

SOUTHEAST LABORATORIES, INC.

RB:DB



SEPTEMBER 10, 1987

LABORATORY REPORT

WESTON SPER 100 ATLANTA TECHNOLOGY CENTER SUITE 120, BLDG. 100 1575 NORTHSIDE DRIVE, N. W. ATLANTA, GEORGIA 30318

REPORT No. <u>25083-4</u>

ATTN: MR. ASHLEY BROWN

SAMPLE MARKING: SPSA 01-GROUND, 8-24-87 1010.

TEST PROCEDURE: EPA METHOD 601 AND 602 AS SET FORTH IN TEST METHODS FOR ORGANIC CHEMICAL ANALYSIS OF MUNICIPAL AND INDUSTRIAL WASTE EPA 600/4-82-027 JULY 1982.

RESULTS

	MICROGRAM/LITER (PPB)		MICROGRAM/LITER (PPB)
BROMODICHLOROMETHANE BROMOFORM BROMOMETHANE CARBON TETRACHLORIDE CHLOROBENZENE CHLOROETHANE 2-CHLOROETHYLVINYL ETH CHLOROFORM CHLOROMETHANE DIBROMOCHLOROMETHANE 1,2-DICHLOROBENZENE 1,3-DICHLOROBENZENE DICHLORODIFLUOROMETHAN 1,1-DICHLOROETHANE 1,2-DICHLOROETHANE 1,2-DICHLOROETHANE 1,2-DICHLOROETHENE 1,1-DICHLOROETHENE 1,1-DICHLOROETHENE 1,2-DICHLOROPROPENE C-1,3-DICHLOROPROPENE T-1,3-DICHLOROPROPENE	<pre><5 <5 <</pre>	METHYLENE CHLORIDE TETRACHLOROETHENE 1,1,1-TRICHLOROETHANE 1,1,2-TRICHLOROETHANE TRICHLOROFLUOROMETHAN VINYL CHLORIDE BENZENE TOLUENE ETHYLBENZENE XYLENES	<5 <5 <5 <5 <5
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RESPECTFULLY SUBMITTED,

SOUTHEAST LABORATORIES, INC.

RB: DB



SEPTEMBER 10, 1987

LABORATORY REPORT

WESTON SPER 100 ATLANTA TECHNOLOGY CENTER SUITE 120, BLDG. 100 1575 NORTHSIDE DRIVE, N. W. ATLANTA, GEORGIA 30318

REPORT No. 25083-5

ATTN: MR. ASHLEY BROWN

SAMPLE MARKING: SPCS 01-GROUND, 8-24-87 1015.

TEST PROCEDURE: EPA METHOD 601 AND 602 AS SET FORTH IN TEST METHODS FOR ORGANIC CHEMICAL ANALYSIS OF MUNICIPAL AND INDUSTRIAL WASTE EPA 600/4-82-027 JULY 1982.

RESULTS

	MICROGRAM/LITER (PPB)		MICROGRAM/LITER (PPB)
BROMODICHLOROMETHANE	<5	METHYLENE CHLORIDE	<5
Bromoform	<5	TETRACHLOROETHENE	<5
BROMOMETHANE	<5	1,1,1~TRICHLORGETHANE	<5
CARBON TETRACHLORIDE	<5	1,1,2-TRICHLORGETHANE	<5
CHLOROBENZENE	<5	TRICHLOROETHENE	<5
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CHLOROFORM	<5		
CHLOROMETHANE	<5	BENZENE	<50
DIBROMOCHLOROMETHANE	<5	TOLUENE	<50
1,2-DICHLOROBENZENE	<5	ETHYLBENZENE	<50
1,3-Dichlorobenzene	<5	XYLENES	<50
1,4-DICHLOROBENZENE	<5		
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T-1,3-DICHLOROPROPENE	<5		
1,1,2,2-TETRACHLOROETH	ANE <5		

RESPECTFULLY SUBMITTED,

SOUTHEAST LABORATORIES, INC.

RB:DB

ANNEX B

Quality Assurance/
Quality Control Data

CONTRACT NO:	CONTRACTOR:			TOD NO.	
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WHITE DPO COPY
BLUE TATL COPY
GREEN ZPM COPY
CANARY PROJECT OFFICER COPY
PINK CONTRACTING OFFICER COPY
GOLDENROD DPO (INTERIM COPY)

(ATTACHMENT)

TDD #04-8810-26-2026 #04-8810-26A-2213

SPECTRUM PRINTING COVINGTON, NEWTON CO., GA

SUBSEQUENTLY RESPONSIBLE FOR INCREASING THE OVERALL TIMELINESS AND EFFECTIVENESS OF THE ACTION. TAT MAINTAINED CONSTANT CONTACT WITH THE OSC APPRISING HIM OF REMOVAL PROGRESS AND PROBLEMS ENCOUNTERED. A DETAILED REPORT IS CURRENTLY BEING COMPILED TO DOCUMENT PRP ACTIONS AT THIS SITE.

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E. ATLANTA, GEORGIA 30365

ENFORCEMENT CONFIDENTIAL

MEMORANDUM

DATE: FEB 5 1990

SUBJECT: Decision not to Take Cost Recovery Action Regarding

Spectrum Printing Company, Inc. Removal Site

(EPA ID #9N)

A. Site Description

The Site in question was formerly operated as a printing facility by Spectrum Printing Co., Inc. In October 1987, EPA was notified of the proposed sale of the Site in connection with the company's bankruptcy proceeding under under Chapter 7. In response, the Department of Justice, acting on behalf of EPA, notified the company that EPA had obtained information that there had been a release of hazardous substances at the Site and that EPA was evaluating whether EPA would take action at the Site pursuant to Section 104 of CERCLA. Subsequently, in 1988, EPA entered into an "Agreement," under which the company has performed the needed removal activities. The removal has been completed.

B. Work Authorized and Conducted and Associated Costs

When EPA was first notified of this Site, the materials stored outside the building were sampled using the Emergency Response and Control Section's Technical Assistance Team (TAT) contractor. Sample results revealed the presence of solvents in waste ink. After the Agreement was executed, the TAT contractor was again used to perform on-site monitoring to insure that the company's contractor complied with the Agreement and any applicable rules and regulations.

EPA's expenditures were as follows:

Contracts \$3,713.37
Payroll 650.54
Indirect 1,668.00
\$6,031.91

C. Discussion of Basis Not To Pursue Cost Recovery

The basis for the decision not to pursue cost recovery for this Site includes the following facts:

1. The principal reason not to pursue cost recovery for this Site is the insolvency of the company which owned and operated the Site.

Even though the company had filed for bankruptcy under Chapter 7 of the Bankruptcy Code, we were able to obtain the agreement of the bankruptcy trustee to conduct the needed removal activities. The work was done under an "Agreement" entered into under Sections 104, 106(a) and 122(a) of CERCLA, which incorporated an approved Immediate Removal Work Plan. In view of our lack of authority to issue an order to the bankrupt compelling the work to be done, the Agreement was somewhat less formal that an Administrative Order, and it did not include a provision for the payment of oversight costs.

The bankruptcy action remains pending according to the attorney for the trustee. In this situation, our sole recourse would have been the filing of a proof of claim in the bankruptcy, and the bar date for such a filing has passed and likely had already passed when the Agreement was executed. Consequently, these oversight costs should be considered not recoverable due to the bankruptcy of the responsible party.

2. Aside from the insolvency of the corporate owner, other factors support the decision not to pursue cost recovery. While we did not explicitly waive payment of oversight costs in the Agreement, we did not request them and should not pursue them after the fact, particularly in light of the cooperation of the company's representatives in agreeing to conduct the work needed. In addition, the automatic stay in bankruptcy would preclude our taking formal action outside of the bankruptcy court to recover our costs.

D. Conclusion

In light of the insolvency and pending bankruptcy of the corporate owner and operator and the cooperation of the bankruptcy trustee in conducting the removal, cost recovery action for EPA's costs of \$6,031.91 should not be pursued.

Reviewer: Project Manager, Cost Recovery Section

Concurrences:

Diffice of Regional Counsel pres 2/190

Distance allison pres 2/190

Chief, South Cost Recovery Unit

Michael Hartal for B. Spaga	2/1/90
Chief, Com Recovery Section	
Mexicus	2/2/21
Chief, Waste Programs Branch	7 7
Satrice M Town	2-5-80
Director, Waste Management Division	

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Lection

AGREEMENT

Parties and Jurisdiction

This Agreement is entered into by and between Richard D. Ellenburg, in his capacity as Trustee in Bankruptcy for Spectrum Printing Company, Inc. (hereafter "the Trustee"), and the United States Environmental Protection Agency (hereafter "EPA"), pursuant to the authority vested in the President of the United States by Section 104, Section 106(a), and Section 122(a) of the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (hereafter "CERCLA"), 42 U.S.C. Section 9604, Section 9606(a), and Section 9622(1), as amended by the Superfund Amendments and Reauthorization Act of 1986 (hereafter called "SARA"), P.L. 99-499 (CERCLA, as amended, may sometimes be hereafter referred to simply as SARA portions of the above-cited sections were delegated "CERCLA"). by the President to the Administrator of EPA by Executive Order 12580, dated January 23, 1987, 52 Fed. Reg. 2923 (Jan. 29, 1987), and were redelegated by interim delegations of the Administrator of EPA to Regional Administrators and Assistant Administrators in EPA Delegation Nos. 14-8-B and 14-14-C, dated February 26, 1987. Trustee consents to and will not contest EPA jurisdiction or authority to enter into this Agreement.

This Agreement concerns the proposed removal of hazardous substances from the printing facility formerly operated by Spectrum Printing, Company, Inc. in Covington, Georgia (hereafter "the Site").

II. EPA Determinations

For the purposes of this Agreement, EPA has determined that:

- A. The release and threat of release of hazardous substances from the Site may present an imminent and substantial endangerment to the public health or welfare or the environment;
- B. In order to protect public health and welfare and the environment, it is necessary that action be taken to mitigate the release and threat of release of hazardous substances from the Site into the environment; and
- C. The actions undertaken to be performed by the Trustee under this Agreement are consistent with the National Contingency Plan, 40 CFR Part 300, as amended.

III. Work To Be Performed

It is hereby agreed that the following activities will be performed:

- A. An Immediate Removal Plan has been submitted on behalf of the Trustee and is incorporated herein by reference as Exhibit A.
- B. A comprehensive Site Safety Plan is to be submitted on behalf of the Trustee within Fourteen (14) days of the effective date of this Agreement. Within Seven (7) days of receipt of the Site Safety Plan, EPA shall notify the Trustee in writing of EPA's approval or disapproval of the Site Safety Plan or any part thereof. In the event of any disapproval, EPA shall specify in writing both the

deficiencies and any EPA recommended modifications.

- C. Within seven (7) days of the receipt of EPA notification of Site Safety Plan disapproval, the Trustee shall amend and submit to EPA a revised plan. In the event of subsequent disapproval of the plan, EPA retains the right to undertake removal or other action pursuant to its authority under CERCLA.
- D. Within five (5) days of EPA approval of the Site Safety
 Plan, the Trustee shall begin implementation of the tasks detailed in
 the approved Immediate Removal Plan and Site Safety Plan. The
 Trustee shall complete implementation within Ninety (90) days of the
 execution of this Agreement.
- E. All actions carried out by the Trustee pursuant to this Agreement shall be done under the oversight of EPA through its On-Scene Coordinator.
- F. The Trustee shall assure access to the Site by EPA and its employees, contractors and consultants for the purposes of overseeing and monitoring the implementation of this Agreement.
- G. The Trustee shall notify EPA Seven (7) days in advance of each action to be taken at the Site pursuant to this Agreement.
- H. All actions carried out by the Trustee pursuant to this Agreement shall be done in accordance with all applicable federal, state, and local laws.
- I. Upon request, the Trustee will provide EPA with split samples of any samples collected in connection with the performance of this Agreement.

- J. All response work performed pursuant to this Agreement shall be under the direction and supervision of a qualified professional engineer or other qualified professional with expertise and experience in hazardous waste site cleanup. The Trustee shall notify EPA as to such engineer or other qualified professional and of any contractors and subcontractors to be used in carrying out the terms of this Agreement promptly following the execution of this Agreement or in advance of their involvement at the Site, whichever is the later.
- K. The Trustee shall use quality assurance/quality control, and chain-of-custody procedures in accordance with EPA Region IV

 Environmental Services Division, Standard Operating Procedures and Quality Assurance Manual, April 1, 1986, throughout all activities.

 The Trustee shall consult with EPA in planning for sampling and analysis. The Trustee shall provide a quality control report to EPA certifying that all activities have been performed as approved.
- L. The Trustee shall preserve all records developed pursuant to the implementation of this Agreement for a period of at least Six (6) years following completion of all work performed pursuant to this Agreement.
- M. Any reports, plans, specifications, schedules and attachments required by this Agreement are, upon approval by EPA, incorporated into this Agreement.
- N. All submittals and notifications to EPA pursuant to this Agreement shall be made to:

Bill Klutz
On-Scene Coordinator
Superfund Branch
Waste Management Division
U.S. EPA - Region IV
345 Courtland Street, N.E.
Atlanta, Goeriga 30365
404/347-3931

O. The Trustee shall provide adequate documentation of the proper disposal of all hazardous substances, by providing the On-Scene Coordiantor with shipment manifests and corresponding inventories.

IV. Reservation of Rights

Nothing in this Agreement will constitute or be construed as a release from any claim, cause or action or demand in law or equity against any person, firm, partnership, or corporation for any liability it may have arising out of or relating in any way to the generation, storage, treatment, handling, transportation, release, or disposal of any hazardous substances, hazardous waste, pollutants, or contaminants found at, taken to, or taken from the Site.

This Agreement does not constitute any decision on preauthorization of funds under Section 111(a)(2) of CERCLA.

In entering into this Agreement, the Trustee waives any right to seek reimbursement under Section 106(b)(2) of CERCLA, 42 U.S.C. Section 9606(b)(2), for any past costs associated with this Site, or any costs incurred in complying with this Agreement.

EPA reserves the right to take any enforcement action pursuant to CERCLA or any other available legal authority, including

the right to seek injunctive relief, monetary penalties, and punitive damages for any violation of law or this Agreement.

V. Notification of the State

Pursuant to Section 106(a) of CERCLA, 42 U.S.C. Section 9606(a), the State of Georgia has been notified of this Agreement by EPA.

VI. Effective Date and Completion

The effective date of this Agreement shall be the date on which it is signed on behalf of EPA or the date on which it is approved by the Bankruptcy Court, whichever is later.

The provisions of this Agreement will be deemed fulfilled upon the Trustee's receipt of written notice from EPA that the Trustee has demonstrated to the satisfaction of EPA that all the terms of this Agreement have been completed. Such written notice shall not be unreasonably withheld.

IT IS SO AGREED:

	Richard Ellenberg, Spectrum Printing	as Trustee	for	Date
	Spectrum Filliting			
_				
	U.S. Environmental	Protection A	aencv	Date

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EXHIBIT 1

IMMEDIATE REMOVAL PLANS

- 1. Within ten days from approval of the Agreement by the Trustee, the EPA, and the Bankruptcy Court, the Trustee's contractor will mobilize a chemist and two technicians to the site to spend one to two days to sample, and perform hazard categorization and staging. The contractor currently understands that there are sixty 5-gallon ink pails, three 55-gallon drums of isopropyl alcohol, and one hundred eighty-five 55-gallon drums (most of which are open and appear to contain water). Additionally, two areas of contaminated dirt (estimated to contain approximately ten 55-gallon drums) will be excavated. Sludge under the presses will be cleaned up and disposed of.
- 2. During this initial staging, the Trustee's Contractor will composite five different waste streams consisting of water, inks, isopropyl alcohol, adhesives, and contaminated dirts and sludges. As needed, the waste streams will be analyzed in order to obtain disposal approval.
- 3. When the sample results are returned and disposal approval is gained, the Trustee's contractor will remobilize one chemist, two technicians, and an operator to bulk and dispose of the materials. Should the water be classified as non-hazardous, the Trustee's contractor will, on behalf of the Trustee, obtain permits to discharge to sewers. Inks will be returned to the

manufacturer. Flammable liquids will be tendered to M&J Solvents in Atlanta. The adhesives and dirt (if tested as hazardous) will be tendered to the Chemical Waste Management Landfill in Emelle, Alabama.

- 4. Other trash, pallets, and empty drums will be tendered to a sanitary landfill. This "cleaning" portion of the job, as set forth in paragraphs 3 and 4 herein, is estimated to take approximately seven days. The Trustee's contractor will be using a vacuum unit, forklift, and backhoe.
- 5. At each stage of the proceeding, the Trustee's contractor will offer to the Agency duplicate copies of the results of analyses performed. The Trustee's contractor has represented to the Trustee that necessary permits and arrangements will be made in accordance with applicable environmental laws.
- 6. All work performed pursuant to this Immediate Removal Plan shall be under the direction and supervision of qualified personnel with expertise and experience in hazardous waste site clean up.

HANSELL & POST

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

THIRTY-THIRD FLOOR FIRST ATLANTA TOWER
ATLANTA, GEORGIA 30383-3101
TELEPHONE 404 581-8000
TELECOPIER 404 581-8330
TELEX 54-2711

56 PERIMETER CENTER EAST, N.E. FIFTH FLOOR ATLANTA, GEORGIA 30346-2283

1667 K STREET, N.W. SUITE 500 WASHINGTON, D.C. 20006-1692

July 19, 1988

Mr. William Klutz
Hazardous Waste Law Branch
United States Environmental
Protection Agency
Region IV
345 Courtland Street, N.E.
Atlanta, Georgia 30365

RE: Spectrum Printing Site

Dear Bill:

Enclosed please find a copy of the Notice received from the United States Bankruptcy Court setting a hearing on the Motion to Approve the Trustee's entering into a Contract with the Environmental Protection Agency. You will note that the hearing is set for August 16, 1988. Also, as stated in the Notice, objections to the Motion must be filed with the Clerk of the Court not later than five working days prior to the hearing. At this time, we are unaware of any objections having been filed.

Sincerely,

Gregory R. Hanthorn

GRH/dr

Enclosure.

cc: Truly F. Bracken, Esquire

IN THE UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION

IN RE

CASE NO. A87-04856-ADK

SPECTRUM PRINTING CO., INC.,

:

Debtor.

NOTICE

Notice is hereby given that Trustee has filed a motion to enter into a contract with the Environmental Protection Agency to cause removal of certain hazardous waste from the property of the Estate and to hire the contractors necessary to perform such work. Trustee has requested that approval of the contract be conditioned upon the Estate and Trustee not being subject to liability for breach of the contract and Trustee being authorized to delegate any and all duties under the contract.

Trustee has also filed a motion to obtain secured financing to fund the work called for under said Agreements. The secured financing motion proposes that the holder of a deed to secure debt on the property in question, The First National Bank of Atlanta, provide the funding to be secured by the same collateral and priority held by that lender as of the filing of the petition in this case.

Copies of all such motions are filed with the Clerk of the Court and available for inspection.

Notice is hereby given that a hearing shall be held upon said Motions before the Court on the day of two., 1988 at 0.00 o'clock A.M. in Room 700, United States Bankruptcy Court, 75 Spring Street, S.W., Atlanta, Georgia 30303. Notice is further given that any objections to said Motions must be filed with the Clerk of this Court not later than five (5) working days prior to the said hearing with a copy served upon counsel for Trustee.

so ordered this 14 day of July, 1988.

A. D. KAHN

United States Bankruptcy Judge

Prepared by:

James S. Altman

83 Walton Street, N.W. Atlanta, Georgia 30303

(404) 525-4000



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET ATLANTA, GEORGIA 30365

City to Syntain

Ms. Cindy Love Haztech Inc. 5280 Panola Industrial Blvd. Decatur Ga. 30065

Dear Cindy:

In reference to our conversation of December 14, 1988 regarding the hazardous waste classification of the organic material at the Spectrum Printing site in Covington, Georgia. Subsequent to an indeterminate finding by Region IV RCRA, and review of the data, the organic/pigmented waste at the site is not representative of a K086 classification. However, due to the presence of organic solvents in EPA's composite sampling and the large quantity of organic solvents present at the site, the pigmented organic compounds appear to belong to the F003, F005 and/or the D001 listings where applicable. Both F class waste codes are appropriate for nonhalogenated solvent waste from nonspecific sources. D001 could also apply, since most solvent waste have a flashpoint of less than 140 degrees Fahrenheit.

If you have any questions or want to discuss this further please give me a call at 404/347-3931.

Sincerely

Bill Klutz

GRH

HANSELL & POST

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS.

THIRTY-THIRD FLOOR FIRST ATLANTA TOWER ATLANTA, GEORGIA 30383-3101



Mr. William Klutz Hazardous Waste Law Branch United States Environmental Protection Agency Region IV 345 Courtland Street, N.E. Atlanta, Georgia 30365

ROUTING AND	TRANSMITTAL SLIP	Date 5 /8 /84
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4.		
5. Action	File	Note and Return
Approval	For Clearance	Per Conversation
As Requested	For Correction	Prepare Reply
Circulate	For Your Information	See Me
Comment	Investigate	Signature
Coordination	Justify	1 1
ike made	o send to the lines you know if you know if you have a few on it is a least the last	should sign
FROM: (Name, org. symbolic Parks)	acked - ORC	Room No.—Bidg. Phone No.
5041-102	Proce	IONAL FORM 41 (Rev. 7-76) ribed by 88A R (41 CFR) 101-11.206

Mr. Gregory R. Hanthorn Hansell & Post First Atlanta Tower Atlanta, Georgia 30383-3101

Re: Spectrum Printing Company, Inc. Site

Dear Mr. Hanthorn:

We have received the manifests documenting the shipment of wastes from the Spectrum Printing Company, Inc. site, together with the data from sampling conducted at the site. Based upon these documents and other information previously provided to EPA and its Technical Assistance Team contractor, you are hereby notified that the terms of the Removal Agreement regarding this site have been satisfactorily completed.

We appreciate your continued cooperation in seeing this removal action through to completion.

Sincerely,

Truly F. Bracken Assistant Regional Counsel Hazardous Waste Law Branch

bcc: Bill Klutz

TBRACKEN/5-5-89

Westinghouse Environmental Services

Westinghouse HAZTECH, Inc.

June 5, 1989

5280 Panola Industrial Boulevard Decatur, Georgia 30035 (404) 981-9332 (404) 981-9339 (24 Hr.) FAX (404) 981-1786

Mr. Richard Ellenberg, Trustee c/o Mr. Gregory R. Hanthorn Hansell and Post First Atlanta Tower, 33rd Floor Atlanta, Georgia 30383-3101

RE: Spectrum Printing

Project Documents
Project Number 2322-88-1240

Dear Mr. Ellenberg:

Please find attached the original, completed manifest for the five final drums of waste shipped from Spectrum to Rineco. As per 40 CFR Part 268.7 (a) (6) this documentation must be kept on file for five years from the final date of waste shipment.

Sincerely,

Westinghouse Environmental and Geotechnical Services, Inc.

Cynthia Love

Project Manager

cc: Mr. Bob Handler

First National Bank of Atlanta Mail Code 212, 2 Peachtree Street

Atlanta, GA 30349

Mr. Bill Klutz

Environmental Protection Agency

345 Courtland Street, N.E.

Atlanta, GA 30365

P. O. Box 9583 Little Hock, Arkansas 12215 Telephone 501-562-7444

(Form designed for use on elite (12-pitch) typewriter.) Please print or type.

Form Approved. OMB No. 2050-0039. Expires 9-30-91

A	UNIFORM HAZARDOUS 1. Generator's US EPA ID No. Manifest Document No. G A D 9 8 1 2 2 6 3 3 5 9 3 2 6 0	2. Pa 1 of			on in the sh by Federal I	laded areas is not law.
	3. Generator's Name and Mailing Address Spectrum Printing	A. Ste		Document	5 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 -	LA PLA
	5280 Panola Industrial Blvd. Decatur, GA 30035	B. Sta	mGerre	326	U	A CONTRACTOR OF THE CONTRACTOR
П	4. Generator's Phone (404) 981–9332		1011			
	5. Transporter 1 Company Name 6. US EPA ID Number 17.	62	HOC	10 T	A ST	644401
	EASE Transportation, Inc. 'SAD9812330000	100		£199407	5455	396 14 47 14
	7. Transporter 2 company mains	F _L Tree	sporters	Phonos.	PC	
ł	9. Designated Facility Name and Site Address	G. Stat	ME"X	10 204	136113	
	Kineco Chemical Industrial	1000	0.282		* * *	
	1007 Vulcan Road. Benton, AR. 72015 [A R D 9 8 1 0 5 7 8 7 0	m. 150.	ility's Pho		-0080	
	12 Contain		27990		14.	
	11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	Type	Q	otal antity	Unit Mt/Vol	Waste No.
Ġ	RQ Waste Combustible Liquid, n.o.s., NA 1993				F	003
N	(Combustible Liquid) F003,F005	: DiM		2	G F	05
A	b.	-1		<u> </u>	1	W. 3. · · ·
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	15. Special Handling Instructions and Additional Information					
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	timicase goingemengency; regilinity poor 42 + 30,000; regilinity emit and the state of the state					
	16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately desc	ribed a	bove by p	roper shipp	ing name ar	d are classified,
	packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable interses sats regulations.					
	If I am a large quantity genefator, I certify that I have a program in place to educe the volume and toxicity of waste generated ticable and that I have selected the practicable method of freetment, stdrage, or disposal currently available to me which min the environment; OR, if I am a small quantity generator, I have noted a good faith effort to minimize my waste generation	imízes	the prese	nt and futur	e threat to h	uman health and
	available to me and that I can afford.		MOCI 1116	7451 WADIE		
Y	PrintedTyped Name Pichard D Filanbarg Trustee of Spectrum		رز <u>ب</u> د		Mont	
-	Richard D. Ellenberg Trustee of Printing 17		nan		8///	141/41917 PC
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R	18 Transporter 2 Acinowledgement of Regulpt of Materials Printed/Typed Name Signature	-(/-			Mont	h Day Year
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	19. Discrepancy indication Space วู พระบางครั้งเกลราชอาการอาณาสาราชาวิทยาลาย เกลร์บางการสาราชาวิทยาลาย เกลร์บางการสาราชาวิทยา			o stales	maa	
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1	20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item	n 19.				
•	Printed/Typed Name Robor: Signature Robor:	_	`		Mont	1
	Jimes Willowells Jamo J) Ho				ير	TIOIOIZ

EPA Form 8700-22 (Rev. 9-88) Previous edition is obsolete.

NOTICE: THE ORIGINAL AND NOT LESS THAN TWO (2) COPIES MUST MOVE WITH THE HAZARDOUS WASTE SHIPMENT. ONCE DELIVERED, THE TREAT-MENT/STORAGE/DISPOSAL FACILITY MUST RETURN THIS ORIGINAL COPY TO THE GENERATOR.

Action Approval As Requested Circulate Comment Coordination EMARKS AN HUBBAS CONTACTOR DDSS, Blo. CALL DDSS, B	File For Clearance For Correction For Your Information Investigate Justify	Note and Return Per Conversation Prepare Reply See Me Signature
Action Approval As Requested Circulate Comment Coordination EMARKS AN HUBBAS CO	File For Clearance For Correction For Your Information Investigate Justify	Per Conversation Prepare Reply See Me Signature
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ROUTING AND TRANSMITTAL SLIP

Date

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

DATE: NOV 2 7 1988

SUBJECT.

Identification of RCRA Hazardous Wastes at Spectrum Printing Company in Covington, Georgia

FR04:

Craig Brown CONTRCRA Branch

TO:

Bill Klutz Superfund Branch

A hazardous waste removal contractor has been retained to clean up the Spectrum Printing site located in Covington, Georgia. One of the clean-up/removal alternatives under consideration is consolidation and stablization of some 300 containers of waste with subsequent disposal in a solid waste landfill. Unless it can be reasonably ascertained that there are no RCRA listed hazardous wastes present at this site EPA should not approve any plan which involves wholesale consolidation and stablization of wastes, particularly if the treated waste is to be disposed of in a solid waste landfill.

It is my understanding that waste characterization carried out during the site investigation was limited to obtaining a physical description of the wastes and testing several composite samples for specific constituents. Although this type of information is useful in sorting waste containers into compatible groups to facilitate safe handling it has little practical value in terms of identifying RCRA hazardous wastes.

Characteristic hazardous wastes can be easily identified by testing representative waste samples for ignitability, corrositivity, E P toxicity, and reactivity as specified in 40 CFR Part 261 and Test Methods for Solid Waste (SW-846). Identifying listed hazardous wastes that may be present at the site would be more difficult since RCRA waste listings are source specific and/or chemical specific. However, print shops which use certain solvents for cleaning presses and other equipment would be expected to generate spent solvents (F001-F005). Additionally, print shops which formulate or mix their own lead or chrome based inks would be expected to generate wash water and sludge from cleaning the mixing equipment (K086). It could reasonably be assumed that inks were formulated onsite if the facility is equipped with mixing vessels or grinding mills.

The best way to determine what if any listed hazardous wastes may be present at the Spectrum Printing site would be to interview the former owner or employees. If this is not possible an indication of the types of waste present at the Spectrum site can be provided from waste audits of print shops similar to the Spectrum Printing Company. However, even if waste composition data were available, direct comparison of samples of waste from Spectrum to wastes generated by active print shops may not be conclusive given that some of the containers at Spectrum were left uncovered, outdoors for months. Finally, if there are drums of unused chemicals inside the building at the Spectrum site the labels on the drums may be checked against the list of commercial chemical products in 40 CFR §261.33, which are hazardous wastes when discarded.

PA/SI 10 B. Javida 19/8/89

INVESTIGATION REPORT

FOR

SPECTRUM PRINTING SITE

COVINGTON, GEORGIA

FROM: J. A. Brown

TAT, Region IV

TO: Bill Klutz, OSC

EPA, Region IV

Technical Direction Document TDD #04-8708-03-1225 TAT #04-F-00929

DATE: 17 September 1987

Technical Assistance Team Roy F. Weston, Inc., SPER Division 100 Atlanta Technology Center, Suite 120 1575 Northside Dr., NW, Atlanta, Georgia 30318



SEPTEMBER 10, 1987

LABORATORY REPORT

WESTON SPER 100 ATLANTA TECHNOLOGY CENTER SUITE 120. BLDG. 100 1575 NORTHSIDE DRIVE, N. W. ATLANTA, GEORGIA 30318

REPORT No. 25083

ATTN: MR. HARRY M. JONES/ASHLEY BROWN

SAMPLE MARKING: SPSC01 8-24-87, 0950.

TEST PROCEDURE: EPA TEST METHODS FOR EVALUATING SOLID WASTE,

> NOVEMBER 1986, SW-846, 3RD ED., TESTED ON PERKIN-ELMER 460 AND 1100 ATOMIC ABSORPTION

SPECTROPHOTOMETER.

RESULTS

ARSENIC	<0.50
BERYLLIUM	<3
CADMIUM	<3
CHROMIUM	14.8
COPPER	270
LEAD	8.3
MERCURY	<0.05
NICKEL	<5
SELENIUM	<0.50
SILVER	<10
THALLIUM	<25
ZINC	7.3
CYANIDE	2.5

NOTE: TEST PROCEDURES ENCLOSED.

RESPECTFULLY SUBMITTED,

SOUTHEAST LABORATORIES, INC.

RB:MS



Qtories 1490 Mecaslin St., N.W. Atlanta. Ga. 30309 (404) 873-1896 (404) 873-1880

SEPTEMBER 10, 1987

LABORATORY REPORT

WESTON SPER 100 ATLANTA TECHNOLOGY CENTER SUITE 120, BLDG. 100 1575 NORTHSIDE DRIVE, N.W. ATLANTA, GEORGIA 30318

REPORT No. 25083

ATTN: MR. HARRY M. JONES/ASHLEY BROWN

SAMPLE MARKING: SPSC02 8-24-87 1000, SPSC-02-01,02,03, 04,05.

TEST PROCEDURE: EPA TEST METHODS FOR EVALUATING SCLID WASTE, NOVEMBER 1986, SW-846, TRD ED., TESTED ON PERKIN-ELMER 460 AND 1100 ATOMIC ABSORPTION

SPECTROPHOTOMETER.

RESULTS

	MG/KG
ARSENIC	<0.50
BERYLLIUM	<3
CADMIUM	<3
CHROMIUM	9,1
COPPER	80.8
LEAD	12.7
MERCURY	<0.05
NICKEL	<5
SELENIUM	<0.50
SILVER	<10
THALLIUM	<25
ZINC	20.7
CYANIDE	14

RESPECTFULLY SUBMITTED,
SOUTHEAST LABORATORIES, INC.

RANDY BROWN



SEPTEMBER 10, 1987

MR. ASHLEY BROWN WESTON SPER 100 ATLANTA TECHNOLOGY CENTER SUITE 120, BLDG. 100 1575 NORTHSIDE DRIVE, N. W. ATLANTA, GEORGIA 30318

RE: QUALITY CONTROL - METALS.

DEAR MR. BROWN:

SAMPLE 25083-1 WAS SPIKED WITH THE FOLLOWING METALS HAVING THE RESPECTIVE RECOVERY:

METAL	PERCENT
ARSENIC	43
BERYLLIUM	87
CADMIUM	94
CHROMIUM	99
COPPER	96
LEAD	93
MERCURY	42
NICKEL	92
SELENIUM	76
THALLIUM	90
ZINC	101

RESPECTFULLY SUBMITTED,

SOUTHEAST LABORATORIES, INC.

RB:MS

RANDY BROWN



SEPTEMBER 10, 1987

LABORATORY REPORT

WESTON SPER 100 ATLANTA TECHNOLOGY CENTER SUITE 120, BLDG. 100 1575 NORTHSIDE DRIVE, N. W. ATLANTA, GEORGIA 30318 ATTN: MR. ASHLEY BROWN

REPORT No. 25083-1

SAMPLE MARKING: SPSC 01-02,03,04,05, 8-24-87 0950.

TEST PROCEDURE: HALOGENATED AND AROMATIC VOLATILE ORGANICS BY EPA METHODS 8010 AND 8020 AS SET FORTH IN TEST METHODS FOR EVALUATING SOLID WASTE SW-846, 2ND EDITION REVISED 1985.

RESULTS

		VE 201	_13		
	MICROGRAM	YK ILOGRAM		MICROGRAM/KILOGRAM	1
		(899)		(299)	
BROMODICHLOROMETH	HANE	<5	METHYLENE CHLORIDE	13	
Bromoform		<5	TETRACHLOROETHENE	<5	
BROMOMETHANE		<5	1,1,1 TRICHLORGETHANE	<5	
CARBON TETRACHLOR	RIDE	<5	1,1,2 TRICHLOROETHANE	<5	
CHLOROBENZENE		<5	TRICHLORGETHENE	<5	
CHLOROETHANE		<5	TRICHLOROFLUOROMETHAN		
2-CHLOROETHYLVIN	YL ETHER	<5	VINYL CHLORIDE	<5	
CHLOROFORM		<5			
CHLOROMETHANE		<5	BENZENE	179	
DIBROMOCHLOROMETH	HANE	<5	TOLUENE	241	
1,2 DICHLOROBENZE	ENE	<5	ETHYLBENZENE	<50	
1,3 DICHLOROBENZE	ENE	<5	XYLENES	26,100	
1,4 DICHLOROBENZS	ENE	<5			
DICHLORODIFLUORON	METHANE	<5			
1,1 DICHLORGETHAN	VE .	<5	•		
1,2 DICHLOROETHAN	VE .	<5			
1,1 DICHLOROETHEN	YE	<5			
T-1,2 DICHLOROETH	HENE	<5	•		
1,2 DICHLOROPROPA	NE	<5			
C-1,3 DICHLOROPRO	OPENE	<5			
T-1,3 DICHLOROPRO	OPENE	<5			
1,1,2,2 TETRACHLO	DROETHANE	<5			

RESPECTFULLY SUBMITTED.

SOUTHEAST LABORATORIES, INC.

R8:08



SEPTEMBER 10, 1987

WESTON SPER LABORATORY REPORT

100 ATLANTA TECHNOLOGY CENTER SUITE 120, BLDG. 100 1575 NORTHSIDE DRIVE, N. W. ATLANTA, GEORGIA 30318

REPORT No. 25083-2

ATTN: MR. ASHLEY BROWN

SAMPLE MARKING: SPSC 02-01,02,03,04,05, 8-24-87 1000.

TEST PROCEDURE: EPA METHOD 601 AND 602 AS SET FORTH IN TEST METHODS FOR ORGANIC CHEMICAL ANALYSIS OF MUNICIPAL AND INDUSTRIAL WASTE EPA 600/4-82-027 JULY 1982.

RESULTS

	MICROGRAM/LITER (PPB)	!	MICROGRAM/LITE
BROMODICHLOROMETHANE BROMOFORM BROMOMETHANE CARBON TETRACHLORIDE CHLOROBENZENE CHLOROETHANE 2-CHLOROETHYLVINYL ET CHLOROFORM CHLOROMETHANE 1,2-DICHLOROBENZENE 1,3-DICHLOROBENZENE 1,4-DICHLOROBENZENE DICHLOROBENZENE 1,1-DICHLOROETHANE 1,2-DICHLOROETHANE 1,2-DICHLOROETHANE 1,2-DICHLOROETHENE T-1,2-DICHLOROETHENE T-1,3-DICHLOROPROPENE C-1,3-DICHLOROPROPENE T-1,3-DICHLOROPROPENE	<pre> <5 <55 <55 <55 <55 <55 <55 <55 <55 <55</pre>	METHYLENE CHLORIDE TETRACHLOROETHENE 1,1,1-TRICHLOROETHANE 1,1,2-TRICHLOROETHANE TRICHLOROFLUOROMETHAN VINYL CHLORIDE BENZENE TOLUENE ETHYLBENZENE XYLENES	9 <5 <5 <5 <5
1,1,2,2-TETRACHLORGET	1312 <5		

RESPECTFULLY SUBMITTED,

SOUTHEAST LABORATORIES, INC.

RANDY BROWN

RB:DB



SEPTEMBER 10, 1987

LABORATORY REPORT

WESTON SPER 100 ATLANTA TECHNOLOGY CENTER SUITE 120, BLDG. 100 1575 NORTHSIDE DRIVE, N. W. ATLANTA, GEORGIA 30318

REPORT NO. 25083-3

ATTN: MR. ASHLEY BROWN

SAMPLE MARKING: SPIC 01-01,02,03,04, 8-24-37 1005.

TEST PROCEDURE: EPA METHOD 601 AND 602 AS SET FORTH IN TEST METHODS FOR ORGANIC CHEMICAL ANALYSIS OF MUNICIPAL AND INDUSTRIAL WASTE EPA 600/4-82-027 JULY 1982.

RESULTS

	MICROGRAM/LITER		MICROGRAM/LITE
BROMODICHLOROMETHANE BROMOFORM BROMOMETHANE CARBON TETRACHLORIDE CHLOROBENZENE CHLOROETHANE 2-CHLOROETHYLVINYL ET CHLOROFORM CHLOROMETHANE DIBROMOCHLOROMETHANE 1,2-DICHLOROBENZENE 1,3-DICHLOROBENZENE 1,4-DICHLOROBENZENE DICHLOROBENZENE 1,1-DICHLOROETHANE 1,2-DICHLOROETHANE 1,1-DICHLOROETHANE 1,2-DICHLOROETHENE 1,2-DICHLOROETHENE C-1,3-DICHLOROPROPENE T-1,3-DICHLOROPROPENE T-1,3-DICHLOROPROPENE	(PPB) <5 <5 <5 <5 <5 <5 <5 <5 <5 <5 <5 <5 <5	METHYLENE CHLORIDE TETRACHLOROETHENE 1,1,1-TRICHLOROETHANE 1,1,2-TRICHLOROETHANE TRICHLOROFLUOROMETHAN VINYL CHLORIDE BENZENE TOLUENE ETHYLBENZENE XYLENES	(PPS) <5 <5 8,000 <5 <5
1,1,2,2-TETRACHLORGET	HANE <5		

RESPECTFULLY SUBMITTED,

SOUTHEAST LABORATORIES. INC.

R8:08



SEPTEMBER 10, 1987

LABORATORY REPORT

WESTON SPER 100 ATLANTA TECHNOLOGY CENTER SUITE 120. BLDG. 100 1575 NORTHSIDE DRIVE, N. W. ATLANTA, GEORGIA 30318

REPORT No. 25083-4

ATTN: MR. ASHLEY BROWN

SAMPLE MARKING: SPSA 01-GROUND, 8-24-87 1010.

TEST PROCEDURE: EPA METHOD 601 AND 602 AS SET FORTH IN TEST METHODS FOR ORGANIC CHEMICAL ANALYSIS OF MUNICIPAL AND INDUSTRIAL WASTE EPA 600/4-32-027 JULY 1982.

RESULTS

Ā	ICROGRAM/LITER (PPB)		MICROGRAM/LITE (PPS)
BROMODICHLOROMETHANE BROMOFORM BROMOMETHANE CARBON TETRACHLORIDE CHLOROBENZENE CHLOROETHANE 2-CHLOROETHYLVINYL ETHE CHLOROFORM CHLOROMETHANE 1,2-DICHLOROBENZENE 1,3-DICHLOROBENZENE 1,4-DICHLOROBENZENE DICHLORODIFLUOROMETHANE 1,1-DICHLOROETHANE 1,1-DICHLOROETHANE 1,1-DICHLOROETHANE 1,1-DICHLOROETHANE 1,2-DICHLOROETHENE T-1,2-DICHLOROPROPENE C-1,3-DICHLOROPROPENE T-1,3-DICHLOROPROPENE	<5 <5 <5 <5 <5 <5 <5 <5 <5 <5	METHYLENE CHLORIDE TETRACHLOROETHENE 1,1,1-TRICHLOROETHANE 1,1,2-TRICHLOROETHANE TRICHLOROFLUOROMETHAN VINYL CHLORIDE BENZENE TOLUENE ETHYLBENZENE XYLENES	<5 <5 <5 <5 <5
1,1,2,2-TETRACHLORGETHA	NE <5		

RESPECTFULLY SUBMITTED,

SOUTHEAST LABORATORIES, INC.

RB:08



SEPTEMBER 10, 1987

LABORATORY REPORT

WESTON SPER 100 ATLANTA TECHNOLOGY CENTER SUITE 120, BLDG. 100 1575 NORTHSIDE DRIVE, N. W. ATLANTA, GEORGIA 30318

REPORT NO. 25083-5

ATTN: MR. ASHLEY BROWN

SAMPLE MARKING: SPCS 01-GROUND, 8-24-87 1015.

TEST PROCEDURE: EPA METHOD 601 AND 602 AS SET FORTH IN TEST METHODS FOR ORGANIC CHEMICAL ANALYSIS OF MUNICIPAL AND INDUSTRIAL WASTE EPA 600/4-82-027 JULY 1982.

RESULTS

	MICROGRAM/LITER (PP8)		MICROGRAM/LITE
BROMODICHLOROMETHANE	<5	METHYLENE CHLORIDE	<5
BROMOFORM	<5	TETRACHLOROSTHENS	<5
BROMOMETHANE	<5	1,1,1-TRICHLOROETHANE	<5
CARBON TETRACHLORIDE	<5	1,1,2-TRICHLOROETHANE	<5
CHLOROBENZENE	<5	TRICHLORGETHENE	<5
CHLOROETHANE	<5	TRICHLOROFLUOROMETHAN	I E <5
2-CHLOROETHYLVINYL ETH	ER <5	VINYL CHLORIDE	<5
CHLOROFORM	<5		
CHLOROMETHANE	<5	BENZENE	<50
DIBROMOCHLOROMETHANE	<5	TOLUENE	<50
1,2-DICHLOROBENZENE	<5	ETHYLBENZENE	<50
1,3-DICHLOROBENZENE	<5	XYLENES	<50
1,4-DICHLOROBENZENE	<5		
DICHLORODIFLUOROMETHAN	€ <5		
1,1-DICHLOROETHANE	<5		
1,2-DICHLORGETHANE	<5		
1,1-DICHLOROETHENE	<5	•	
T-1,2-DICHLOROETHENE	<5		
1,2-DICHLOROPROPANE	<5		
C-1,3-DICHLOROPROPENE	<5		
T-1,3-DICHLOROPROPENE	<5		
1,1,2,2-TETRACHLOROETH	ANE <5		

RESPECTFULLY SUBMITTED,

SOUTHEAST LABORATORIES, INC.

RB:08



SEPTEMBER 10, 1987

MR. ASHLEY BROWN WESTON SPER 100 ATLANTA TECHNOLOGY CENTER SUITE 120, BLDG. 100 1575 NORTHSIDE DRIVE, N. W. ATLANTA, GEORGIA 30318

QUALITY CONTROL - VOLATILE ORGANICS, OUR REPORT No. 25083.

DEAR MR. BROWN:

BLANK WAS CARRIED THROUGH THE EXACT PROCEDURES AS WERE THE SAMPLES. THE FOLLOWING CONTAMINANTS WERE FOUND:

BROMODICHLOROMETHANE-----METHYLENE CHLORIDE-----1.4 PP8 TETRACHLOROETHENE-----0.4 PPB

SPIKE SAMPLE:

THE SPIKE SAMPLE WAS TREATED EXACTLY AS THE SAMPLES WERE TREATED. SAMPLE 25083-2 WAS SPIKED WITH THE FOLLOWING VOLATILE ORGANICS:

1,1-DICHLOROETHENE	97%	RECOVERY
TETRACHLOROETHENE	64%	RECOVERY
ETHYL BENZENE	48%	RECOVERY

RESPECTFULLY SUBMITTED,

SOUTHEAST LABORATORIES. INC.

RB:MS

SEPA

POTENTIAL HAZARDOUS WASTE SITE SITE INSPECTION REPORT

I. IDENTIFICATION					
	01 STATE	02 SITE NUMBER			
	GA	W10277			

PART 1 - SITE LOCATION AND INSPECTION INFORMATION				
II. SITE NAME AND LOCATION			7.5.50	
SPECTRUM PRINTING		STREET, HOUTE NO., OR SPECI 4/ 3.2 U.S. STATE OS ZIP CODE OR		.7 <i>8</i>
COVINGTON	(GA 30209 1		07COUNTY 08 CONG CODE DIST
33 JE 15. 83 12 63.	O TYPE OF OWNERSHIP IN A. PRIVATE DESCRIPTION OTHER LE	B FEDERAL US/ E/E SHI/?	C. STATE D. COUNTY	E. MUNICIPAL
III. INSPECTION INFORMATION Of Date of INSPECTION L 102 SITE STATUS	OJ YEARS OF OPERATION	4		
E 14 67 TO ACTIVE MINACTIVE		NG YEAR ENDING YEAR	X UNKNOWN	
04 AGENCY PERFORMING INSPECTION (Check at that apply)	(6) * <			
- IND	ne or min) .	C. MUNICIPAL D. MUN	IICIPAL CONTRACTOR	(Name of Sim)
	of here)	G. OTHER	(Saechr)	
OS CHIEF INSPECTOR JUHN ASHLE / PORCHIN DO OTHER INSPECTORS	CIVIL EI	V GINEER	ROYF WEDITION	08 TELEPHONE NO. (464) 352 4147
09 OTHER INSPECTORS	10 TITLE	_	11 ORGANIZATION	12 TELEPHONE NO.
()Klutz	EDA	Cac	EPA	(404) 347.3951
				()
				()
				()
				()
13 SITE REPRESENTATIVES INTERVIEWED	14 1171.6	15ADORESS		16 TELEPHONE NO
				()
				()
				()
				()
				()
	·			
17 ACCESS GAINED BY 18 TIME OF INSPECTION (Check one) # PERMISSION (C) 9 (C) WARRANT	CLEA2	ons , WARIY		
IV. INFORMATION AVAILABLE FROM				
RAMONA U. KLEIN 04 PERSON RESPONSIBLE FOR SITE WSPECTION FORM	GEORGIA	DEPT OF NATO	RALRES.	03 TELEPHONE NO. (4-7-) 6 SC - 25.56
OU PERSON RESPONSIBLE FOR SITE INSPECTION FORM	OS AGENCY EPA -TAT	OB ORGANIZATION RUYF VUESTLIV	07 TELEPHONE NO. (404) 356 4147	DE DATE

POTENTIAL HAZARDOUS WASTE SITE

	II ICA I ION
OJSTATE	02 SITE NUMBER
12A	W0219

II. PERMIT INFORMATION 11 TYPE OF PERMIT SSUED 12 PERMIT NUMBER 13 CATE ISSUED 14 EXPIRATION DATE 15 A NPDES 16 UIC 17 CA NPDES 18 UIC 19 A RCRA 10 A RCRA 10 A RCRA 11 D RCRA 12 RCRA INTERIM STATUS 13 STATE SSUEN 14 LOCAL SSUENT 15 J THER SSUENT 16 J THER SSUENT 17 STORAGE DISPOSAL CAREN MINING DATE 18 PILES 19 C J RUMS, ABOVE GROUND 10 TANK, ABOVE GROUND 10 TANK, ABOVE GROUND 10 TANK, ABOVE GROUND 11 LANDFAIM 11 CANDFAIM 12 LANDFARM 13 C J RUMS, ABOVE GROUND 14 LANDFARM 15 LOTHER 16 LANDFARM 17 COMMENTS 18 CONTAINMENT 19 CONTAINMENT 10 C CHANGE SIENCY 10 OTHER SSUENT 10 OTHER SSUENT 11 OTHER 12 C SSUENT RECOVER 13 MODERATE 14 OTHER 15 C SSUENT RECOVER 15 C SSUENT RECOVER 16 CONTAINMENT 17 COMMENTS 18 MODERATE 19 LANDFARM 10 CONTAINMENT 10 CONTAINMENT 11 CONTAINMENT 12 C SSUENT RECOVER 13 MODERATE 14 C STATE SSUENT 15 C SSECRIPTION OF DRUMS, DIKING LINERS, BARRIERS, ETC.	110N GA W0219
The property of masters of the serving and the property of the	
□ A NPDES □ B UIC □ C. AIR □ D. RCRA □ E. RCRA INTERIM STATUS □ F. SPCC PLAN □ G. STATE (Specin) □ J. TONE □ J. THER (Specin) □ J. NONE SITE DESCRIPTION STORAGE DISPOSAL CHECK MINH APPLY 32 AMOUNT □ D. TANK, ABOVE GROUND □ D. TANK, ABOVE GROUND □ D. TANK, ABOVE GROUND □ E. (C. CHEMICAL PHYSICA □ D. TANK, BELOW GROUND □ E. (C. CHEMICAL PHYSICA □ D. TANK, BELOW GROUND □ E. (C. CHEMICAL PHYSICA □ D. TANK, BELOW GROUND □ E. (C. CHEMICAL PHYSICA □ D. TANK, BELOW GROUND □ E. (C. CHEMICAL PHYSICA □ D. TANK, BELOW GROUND □ E. (C. CHEMICAL PHYSICA □ D. TANK, BELOW GROUND □ E. (C. CHEMICAL PHYSICA □ D. TANK, BELOW GROUND □ E. (C. CHEMICAL PHYSICA □ D. TANK, BELOW GROUND □ E. (C. CHEMICAL PHYSICA □ D. TANK, BELOW GROUND □ E. (C. CHEMICAL PHYSICA □ D. BIOLOGICAL □ E. (C. CHEMICAL PHYSICA □ D. BIOLOGICAL □ E. (C. CHEMICAL PHYSICA □ D. BIOLOGICAL □ D. BIOLOGICA	05 COMMENTS
E. B. UIC C. AIR D. RCAA E. RCRA INTERIM STATUS F. SPCC PLAN G. STATE 1500CM T. DTHER 500CM STORAGE DEPOSAL CHECK MITTH ADDIT 122 AMOUNT 33 UNIT OF MEASURE A. INCENERATION T. A. INCENERATION T. A. SURFACE IMPOUNDMENT T. B. PILES C. C. JUNIS ABOVE GROUND T. TANK, ABOVE GROUND T. F. LANDFILL G. LANDFARM T. G. JANDFARM T. G. JANDFARM T. OPEN DUMP T. OTHER SOCKET CONTAINMENT A COCESSIBILITY J. WASTE EASILY ACCESSIBLE: XYES INO 32 COMMENTS	
CONTAINMENT CONTA	
D RCRA E RCRA INTERIM STATUS F SPCC PLAN G STATE, Spectry H LOCAL Spectry J. NONE SITE DESCRIPTION STORAGE DISPOSAL, Chees at mail app. A SURFACE IMPOUNDMENT B. PILES C. CRUMS, ABOVE GROUND D. TANK, ABOVE GROUND E. TANK, SBLOW GROUND F LANDFILL G LANDFARM H OPEN DOMP II. OTHER Spectry COMMENTS CONTAINMENT CONTAINMENT CONTAINMENT ACCESSIBILITY JI WASTE EASILLY ACCESSIBLE: XYES INO 22 COMMENTS	
TE RORA INTERIM STATUS TF SPCC PLAN G. STATE (Specim) TH LOCAL (Spe	
☐ F SPECPLAN ☐ STATE 1500CM ☐ LOCAL 1500CM ☐ J. THER 1500CM ☐ J. THER 1500CM ☐ J. TONE ☐ J. YONE ☐ A. SURFACE IMPOUNDMENT ☐ B. PILES ☐ C. CHEMICAL PHYSICA ☐ D. TANK, ABOVE GROUND ☐ E. TANK, SELOW GROUND ☐ E. TANK SELOW GROUND ☐ E. TANK SELOW GROUND ☐ I. OTHER ☐ H. OPEN DUMP ☐ I. OTHER ☐ SOUTHER SOUTH ☐ A ADECUATE, SECURE ☐ B. MODERATE ☐ C. INADEQUATE, POOR ☐ DESCRIPTION OF DRUMS, DIXING UNERS, BARRIERS, ETC. ACCESSIBILITY ☐ WASTE EASILY ACCESSIBLE: XYES ☐ NO 22 COMMENTS	
G STATE Species H LOCAL Species I. OTHER Species II OTHER Species I. OTHER Speci	
□ H. LOCAL Specific D. D. THER Specific D. SITE DESCRIPTION STORAGE DISPOSAL ICREE MINIMARIAN DESCRIPTION □ A. SURFACE IMPOUNDMENT □ A. INCENERATION DESCRIPTION DESCRIPTION DESCRIPTION DESCRIPTION DESCRIPTION DESCRIPTION DESCRIPTION DESCRIPTION OF DRUMS. ABOVE GROUND □ S. HOLD GROUND □ S. HO	
2.1. OTHER SOCKER 2.1. NONE SITE DESCRIPTION TO A SURFACE IMPOUNDMENT 2.2. A SURFACE IMPOUNDMENT 2.3. UNDERGROUND 3.3. UNDERGROUND 3.4. INCENERATION 3.5. UNDERGROUND 3.5. CALMS, ABOVE GROUND 3.6. CARLMS, ABOVE GROUND 3.7. E LANDFILL 3.6. CALMSFILL 3.6. CANDFILL 3.6. CANDFILL 3.6. CANDFILL 3.6. OTHER RECYCLING 3.6. OTHER RECYCLING 3.6. OTHER 3.6. CONTAINMENT COMMENTS CONTAINMENT CONTAINMENT CONTAINMENT CONTAINMENT CONTAINMENT OF WASTES, Check one) 3.6. ADEQUATE, SECURE 3.6. MODERATE 3.6. CONTAINMENT CONTAINMENT OF WASTES, Check one) 3. ADEQUATE, SECURE 3. MODERATE 3. MODERATE 3. C. INADEQUATE, POOR CESCRIPTION OF DRUMS, DIXING LINERS, BARRIERS, ETC.	
SITE DESCRIPTION STORAGE DISPOSAL, Cheer an mar applied 32 AMOUNT* 33 UNIT OF MEASURE A. SURFACE IMPOUNDMENT 3 PILES C. CHANS, ABOVE GROUND D. TANK, ABOVE GROUND E. TANK, BELOW GROUND E. TANK, BELOW GROUND E. TANK, BELOW GROUND E. LANDFILL G. CHEMICAL PHYSICA D. BIOLOGICAL E. WASTE CIL PROCESS F. SOLVENT RECOVERY G. OTHER RECYCLING TH. OTHER SOMMENTS CONTAINMENT CONTAINMENT CONTAINMENT CONTAINMENT OF WASTES, Cheer one) A. ADEQUATE, SECURE B. MODERATE C. INADEQUATE, POOR ACCESSIBILITY JI WASTE EASILY ACCESSIBLE: XYES INO 32 COMMENTS	
SITE DESCRIPTION STORAGE DISPOSAL CHEEK MINIS ADDITY 32 AMOUNT 33 UNIT OF MEASURE A. INCENERATION 34 INCENERATION 35 UNDERGROUND INJE 4. C. CHEMICAL PHYSICA 5. C. CHEMICAL PHYSICA 5. C. CHEMICAL PHYSICA 5. C. CHEMICAL PHYSICA 5. C. CHEMICAL PHYSICA 6. C. CHEMICAL PHYSICA 7. D. BIOLOGICAL 7. S. SOLVENT RECOVER 7. G. OTHER RECYCLING 7. H. OTHER 7. OTHER 8. MODERATE 7. C. INADEQUATE, POOR 8. DESCRIPTION OF DRUMS, DIKING, UNERS, BARRIERS, ETC. 8. ACCESSIBILITY 7. DESCRIPTION OF DRUMS, DIKING, UNERS, BARRIERS, ETC.	
STORAGE DISPOSAL I CRECK MINISTED A. SURFACE IMPOUNDMENT B. PILES C. CRUMS, ABOVE GROUND C. TANK, ABOVE GROUND F. LANK BELOW GROUND G. LANK BELOW GROUND G. LANDFARM H. OPEN DUMP COMMENTS CONTAINMENT CONTAINMENT CONTAINMENT CONTAINMENT CESCRIPTION OF DRUMS, DIKING UNERS, BARRIERS, ETC. A. INCENERATION G. A. IN	
A. SURFACE IMPOUNDMENT 3. PILES C. CHUMS, ABOVE GROUND D. TANK, ABOVE GROUND E. TANK, BELCW GROUND E. TANK, BELCW GROUND E. TANK, BELCW GROUND E. WASTE CIL PROCESS F. SOLVENT RECOVER G. LANDFARM H. OPEN DUMP I. OTHER SOCKET COMMENTS CONTAINMENT CONTAINMENT A. ADEQUATE, SECURE B. MODERATE C. INADEQUATE, POOR DESCRIPTION OF DRUMS, DIKING LINERS, BARRIERS, ETC. ACCESSIBILITY 1 WASTE EASILY ACCESSIBLE: XYES INO 12 COMMENTS	26 271/52
The state of the s	25 OTHER
C CRUMS, ABOVE GROUND D. TANK, ABOVE GROUND E. TANK, SELOW GROUND E. TANK, SELOW GROUND F. LANDFILL G. LANDFARM H. OPEN DUMP COMMENTS CONTAINMENT CONTAINMENT CONTAINMENT CONTAINMENT CONTAINMENT CONTAINMENT OF WASTES, Creer one) A ADEQUATE, SECURE D. BIOLOGICAL E. WASTE CIL PROCESS F. SOLVENT RECOVER G. OTHER RECYCLING, H. OTHER Society) COMMENTS CONTAINMENT CONTAINMENT CONTAINMENT CONTAINMENT CONTAINMENT CONTAINMENT CONTAINMENT A ADEQUATE, SECURE D. B. MODERATE C. INADEQUATE, POOR CESCRIPTION OF DRUMS, DIKING LINERS, BARRIERS, ETC.	X A. BUILDINGS ON SITE
D. BIOLOGICAL E. TANK, BELOW GROUND E. TANK, BELOW GROUND F. LANDFILL G. LANDFILL G. LANDFARM H. OPEN DUMP I. OTHER Society COMMENTS CONTAINMENT A ADEQUATE, SECURE D. BIOLOGICAL E. WASTE CIL PROCESS G. OTHER RECYCLING H. OTHER Society Society COMMENTS CONTAINMENT CONTAINMENT OF WASTES, Cheer one) A ADEQUATE, SECURE D. B. MODERATE C. INADEQUATE, POOR CESCRIPTION OF DRUMS, DIKING UNERS, BARRIERS, ETC. ACCESSIBILITY D1 WASTE EASILY ACCESSIBLE: XYES INO	JECTION
E. TANK, BELOW GROUND F. LANDFILL G. LANDFARM H. OPEN DUMP I. OTHER Socially CONTAINMENT CONTAINMENT CONTAINMENT GRASTES, Check only A ADEQUATE, SECURE DESCRIPTION OF DRUMS, DIKING UNERS, BARRIERS, ETC. 2. E. WASTE CIL PROCESSIBLE: F. SOLVENT RECOVER: G. OTHER RECYCLING, H. OTHER Socially CONTAINMENT AL I	
F. LANDFILL G. LANDFARM H. OPEN DUMP I. OTHER Socially COMMENTS CONTAINMENT CONTAINMENT CONTAINMENT GRANTES. Cheep one) A ADEQUATE, SECURE DESCRIPTION OF DRUMS, DIKING UNERS, BARRIERS, ETC. ACCESSIBILITY JI WASTE EASILY ACCESSIBLE: XYES INO 32 COMMENTS	SSING DE AREA OF SITE
G. CONTAINMENT CONTAINMENT CONTAINMENT CONTAINMENT G. MASTES. Creecy one) A. ADEQUATE, SECURE G. MODERATE G. MADEQUATE, POOR DESCRIPTION OF DRUMS, DIKING LINERS, BARRIERS, ETC. ACCESSIBILITY 11 WASTE EASILY ACCESSIBLE: XYES G. NO. 32 COMMENTS	1
TH. OTHER Specify) COMMENTS CONTAINMENT CONTAINMENT OF WASTES. Cheer one) A ADEQUATE, SECURE DESCRIPTION OF DRUMS, DIKING, UNERS, BARRIERS, ETC. ACCESSIBILITY ACCESSIBILITY ON WASTE EASILY ACCESSIBLE: XYES INO COMMENTS	1 0000000
CONTAINMENT CONTAINMENT CONTAINMENT OF WASTES. Cheer one) A A DEQUATE, SECURE B MODERATE C. INADEQUATE, POOR DESCRIPTION OF DRUMS, DIKING LINERS, BARRIERS, ETC. ACCESSIBILITY DI WASTE EASILY ACCESSIBLE: XYES INO 12 COMMENTS	***************************************
CONTAINMENT CONTAINMENT CONTAINMENT CONTAINMENT OF WASTES. Cheep one) A. ADEQUATE, SECURE B. MODERATE C. :NADEQUATE, POOR DESCRIPTION OF DRUMS, DIKING, UNERS, BARRIERS, ETC. ACCESSIBILITY D1 WASTE EASILY ACCESSIBLE: XYES INO D2 COMMENTS	pecify)
CONTAINMENT OF WASTES, Check one) A. ADEQUATE, SECURE B. MODERATE C. INADEQUATE, POOR DESCRIPTION OF DRUMS, DIKING UNERS, BARRIERS, ETC. ACCESSIBILITY D1 WASTE EASILY ACCESSIBLE: XYES C. NO. D2 COMMENTS	
2 DESCRIPTION OF DRUMS, DIKING, LINERS, BARRIERS, ETC. 7. ACCESSIBILITY 21 WASTE EASILY ACCESSIBLE: XYES Z NO 22 COMMENTS	
. ACCESSIBILITY 21 WASTE EASILY ACCESSIBLE: XYES Z NO 32 COMMENTS	DINSECURE, UNSOUND, DANGEROUS
32 COMMENTS	
1. SOURCES OF INFORMATION (Gre-specific references, e.g. state (less, sample analysis, leborts)	



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POTENTIAL HAZARDOUS WASTE SITE SITE INSPECTION REPORT ART 5 - WATER, DEMOGRAPHIC, AND ENVIRONMENTAL DATA

	I. IDENTIFICATION					
-	OLSTATE	02 SITE NUMBER				
1	0.4	WO 2-22				

	PART 5 - WATER, DEMOGRAPH	IC, AND ENVIRONMENTAL DATA	10 4 100 200
VI. ENVIRONMENTAL INFORMATION			
OT PERMEABILITY OF UNSATURATED ZONE (
⊒ 4, 10 ⁻⁶ = 10 ⁻⁸ sm/.	sec □ 8, 10-4 - 10-5 cm/sec □	C. 10 ⁻⁴ = 10 ⁻³ cm/sec ☐ D. GREATE	R THAN 10 ⁻³ cm/sec
CZ PERMEABILITY OF BEDROCK (Check one)			
☐ A. IMPERMEABL Less than 10 ⁺⁶ ct	LE 3 B. RELATIVELY IMPERMEAB (10 ⁻⁴ = 10 ⁻⁶ cm sec)	LE C. RELATIVELY PERMEABLE C	D. VERY PERMEABLE 'Greater men 10 ⁻² cm/sec)
04 D	EPTH OF CONTAMINATED SOIL ZONE	US SOIL PH	
m	<u></u> ,n)		
JE NET PRECIPITATION 07 C	NE YEAR 24 HOUR RAINFALL	SITE SLOPE DIRECTION OF SITE	SLOPE, TERRAIN AVERAGE SLOPE
,in)	;in)		
09 FLOOD POTENTIAL	10		
SITE IS INYEAR FLOODPL	_AIN SITE IS ON BARR	ER ISLAND, COASTAL HIGH HAZARD ARE	A, RIVERINE FLOODWAY
11 DISTANCE TO WETLANDS (5 acre minimum)		12 DISTANCE TO CRITICAL HABITAT or endange	Pred species)
ESTUARINE	OTHER		(mi)
A(mi)	3(mi)	ENDANGERED SPECIES:	
13 LAND USE IN VICINITY		<u> </u>	
DIST-NCE TO:		NA 07.75 DADVO	
COMMERCIAL INDUSTRIAL	RESIDENTIAL AREAS: NATIO FORESTS, OR WILDUR		RICULTURAL LANDS AND AG LAND
A 201 (mi)	3	(mi) C	(mi) D(mi)
14 DESCRIPTION OF SITE IN RELATION TO SUI	RROUNDING TOPOGRAPHY		
TERRAIN :	S SLIGHTLY HILL	-7. THE SITE IS	waten
ON THE PLATE	EAU OF A MOSI	um-sized HILL	
VII. SOURCES OF INFORMATION (CA)			
		. /epuris/	
uses topo n	MAS		

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POTENTIAL HAZARDOUS WASTE SITE SITE INSPECTION REPORT PART 7 - OWNER INFORMATION

I. IDENTIFICATION						
DISTATE	02 SITE NUMBER					
6.4	W0277					

I. CURRENT OWNER(S)			PARENT COMPANY TADORCA	Debi	
1 NAME		2 D+B NUMBER	08 NAME	io	9 D+8 NUMBER
RICHIARY ELLENBERGER	201766				
3 STREET ADDRESS PO BOD RECT AS TO ALTUN ST A		04 SIC CODE	10 STREET ADDRESS P 0 Son AFD	# #IC]	11 SIC CODE
83 WALTON ST N	/ W				
5 CITY	08 STATE	07 ZIP CODE	12 CITY	13 STATE 1	4 ZIP CODE
ATLANTA	6-1	30 516			
1 NAME		02 D+8 NUMBER	C8 NAME		RABMUN 6+0 6
3 STREET ADDRESS P O BOA AFD # etc)		04 SIC CODE	110 STREET ACORESS P O BOR RED	# #IC.)	111 SIC CODE
					J
5 CITY	D6 STATE	07 ZIP CODE	112 CITY	113 STATE 1	1 4 2 9 CODE
		0. E. 00DE		133.212	4 AF CODE
21 1115		02.0+3.4u.c.055	LOS VALVE		20. 310:::25=
DI NAME		02 D+8 NUMBER	08 NAME	1°	9 0 + 6 NUMBER
	<u>.</u>				
3 STREET ADDRESS (P.O. Box AFD # etc.)		04 SIC CODE	10 STREET ADORESS IP O Box. AFD	P BIG.I	11 SIC CODE
		<u> </u>			
5 CITY	36 STATE	O7 ZIP CODE	12 CITY	13 STATE !	4 ZP CODE
1 NAME		02 D+8 NUMBER	C8 NAME	10	90+8 NUMBER
03 STREET ADDRESS (P O BOX RED P etc.)		04 SIC CODE	10 STREET ADDRESS P C 301 3FD	P. etc.)	11 SIC CODE
		1			
D5 CITY	C6 STATE	07 ZIP CODE	112 CITY	ISSTATE	14 ZIP CODE
THE PRESURE AND LEGAL			W SEALTH CHUICEAN	<u> </u>	
III. PREVIOUS OWNER(S) Let most recent h		C2 D+8 NUMBER	IV. REALTY OWNER(S) of app		2 D+8 NUMBER
RALPH PREDDY		UZ U = S NOMBEN	3. TAME		3.44
DALIFF INCEDIO		34 SIC CODE	32.673677.4257568		134 810 0005
		34 310 0002	33 STREET ADDRESS P & Box AF	Q ● •t¢ i	34 SIC CODE
UNKNUWIN	ionori in				
05 City	38514-6	07 ZiP CODE	CS CITY	G6 STATE (D7 ZIP CODE
1 NAME		32 0+8 NUMBER	C: NAME		FARMUN 8+C SC
33 STREET ADDRESS PO Box 250 4 etc /		04 SIC CODE	33 STREET ADDRESS (P.O. 35x, 45)	O # aic.)	04 SIC CODE
			<u> </u>		
S CITY	C6 STATE	OT ZIP CODE	15 CITY	JO STATE	D7 ZIP CODE
1 NAME	!	32 DIFB NUMBER	SI NAME	1	REBMUMBER C SC
				•	
03 STREET ADORESS, P ⊃ Sox AFD # ere.)		94 SIC COEE	DO STREET ADDRESS PIG Box AFS	o elc i	04 SIC CODE
SCITY	DE STATE	J7 ZIP CODE	35 CITY	15 STATE	or zie code
	1 1		1		
V. SOURCES OF INFORMATION Cite SO					

POTENTIAL HAZARDOUS WASTE SITE

I. IDENTIFICATION

SEPA	PART 9		ECTION REPORT RANSPORTER INFORMATION	GA	100 211
II. ON-SITE GENERATOR					
DI NAME		D2 D+8 NUMBER			· · · · · · · · · · · · · · · · · · ·
D3 STREET ADDRESS - 2 0 dox AFD # elc		04 SIC CODE			
DS CITY	CB STATE	07 ZIP CODE			
III. OFF-SITE GENERATOR(S)	<u>:</u>		<u> </u>		
O! VAME		32 0+8 NUMBER	OT NAME	!	02 D+8 NUMBER
STREET ADDRESS IP 9 Sor. RFD # etc.)		04 SIC CODE	03 STREET ADDRESS P 0 301 250 # etc.)		04 SIC CODE
IS CITY	36 STATE	07 ZIP CODE	ээспү	28 STATE	07 ZP CODE
CT NAME		C2 D+8 NUMBER	O1 NAME		02 0+8 NUMBER
3 STREET ADDRESS P 0 304 350 # etc.;		04 SIC CODE	DI STREET ACCIPESS (P.O. 304, FED. etc.)		64 SIC CODE
OS CITY	DO STATE	37 ZIP CODE	DS CITY	06 STATE	107 ZIP GODE
IV. TRANSPORTER(S)					
)1 NAME		J2 D+8 NUMBER	OT NAME		02 D+3 NUMBER
3 STREET AODRESS P o Box. 9F2 # +tc.)		04 SIC CODE	DE STREET ACORESS (P.D. SON ARC F. etc.)		04 SIC CODE
S CITY	36 STATE	O7 ZIP CODE	05 CITY	06 STATE	107 ZIP CODE
DI NAME		22 0 + 3 NUMBER	31 NAME		02 D+8 NUMBER
SSTREET ADDRESS P.O. Son HED # MIC.)		04 SIC CODE	DS STREET ADDRESS PID 364 350 4 46)		04 SIC CODE
DS CITY	25 STATE	D7 ZIP CODE	25 CITY	JE STATE	07 ZIP CODE
V. SOURCES OF INFORMATION (Gre sa	ecitic references.	e g., state ives, samore aneres	in reports		<u></u>



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POTENTIAL HAZARDOUS WASTE SITE SITE INSPECTION REPORT PART 10 - DAST RESPONSE ACTIVITIES

L. IDENTIFICATION					
OI STATE	02 SITE	NUMBER			
64	h 0	2-17			

YEFA	PART 10 - PAST RESPONSE ACTIVITIES	GA Ino 2-22		
PAST RESPONSE ACTIVITIES (Continued)				
01 I R BARRIER WALLS CONSTRUCTED 04 DESCRIPTION	G2 DATE	03 AGENCY		
01 I S CAPPING COVERING 04 CESCRIPTION	02 DATE	03 AGENCY		
01 II T BULK TANKAGE REPAIRED 04 DESCRIPTION	D2 DATE	33 AGENCY		
01 I U GROUT CURTAIN CONSTRUCTED 04 DESCRIPTION	G2 DATE	23 AGENCY		
31 T V BOTTOM SEALED 34 DESCRIPTION	02 DATE	03 AGENCY.		
01 I W. GAS CONTROL 04 DESCRIPTION	32 DATE	03 AGENCY		
01 T.X. FIRE CONTROL 04 DESCRIPTION	D2 DATE	23 AGENCY		
01 II Y. LEACHATE TREATMENT 04 DESCRIPTION	02 DATE	J3 AGENCY		
01 II Z. AREA EVACUATED 04 DESCRIPTION	D2 DATE	33 AGENCY		
01 To 1 400ESS TO SITE RESTRICTED 04 DESCRIPTION	D2 GATE	13 AGENCY		
01 T 2. POPULATION RELOCATED 04 DESCRIPTION	02 DATE	J3 AGENCY		
01 X 3. OTHER PEMEDIAL ACTIVITIES 04 DESCRIPTION	02 DATE 8-24-87	33 AGENCY CLEY SE COUNTY 76.		

BARRIER TAPE PUT IN PLACE

III. SOURCES OF INFORMATION | Cité specific references e.g., state fries, sample analysis, reports

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POTENTIAL HAZARDOUS WASTE SITE PRELIMINARY ASSESSMENT PART 1. SITE INFORMATION AND ASSESSMENT

LIDENTIFICATION				
O) STATE	DE SITÉ NUMBER			
GA	WC 292			

PART 1 - SITE INFORM	ATION AND ASSESSMENT
II. SITE NAME AND LOCATION	
01 SITE NAME (Legal common, or descriptive name of stre)	02 STREET, ROUTE NO LOR SPECIFIC LOCATION IDENTIFIER
SPECTRUM PRINTING	4132 U.S. HIGHWAY 278
COVINGTON	OA STATE OS ZIP CODE OG COUNTY ()A 3C2CO) INEW, GN
09 COORDINATES LATITUDE LONGITUDE 33 36.15. 63.5203.	
10 DIRECTIONS TO SITE (Starting from nearest public road)	- Annon matter 24 mills 72
FROM ATLANTA TAKE INTERSTATE 20 EAS	S. 275 MST MPERIL I HILE TO
WEST STREET GO LEFT APPROX I	OC FEET SITE IS UN THERIOM?
III. RESPONSIBLE PARTIES	
O1 OWNER IS REPORTED	C2 STREET ,Business, making, residential)
RICHARD ELLENBURG (TRUSTLE)	OS WALTON ST IN W
ATLANTA	GA STATE OS ZIP GODE OS TELEPHONE NUMBER GA 303,8 1404 525 4000
07 OPERATOR :# snown and deterant from owners	OB STREET (Business, maung, residential)
00 CITY	10 STATE 11 ZIP GODE 12 TELEPHONE NUMBER
13 TYPE OF DWNERSHIP Check one	TO STATE TO SOCIATE TO A MINISTER
JA PRIVATE JB FEDERAL:	DIG. STATE INDICOUNTY IN EL MUNICIPAL
XF. OTHER: TRUSTCE SHIP - RICHARD ELLEN	Z G. UNKNOWN
14 OWNER OPERATOR NOTIFICATION ON FILE (Check of that apply)	
C A RCRA 3001 DATE RECEIVED MONTH DAY YEAR DB. UNCONTRO	LLED WASTE SITE (GERGLA 103 6) DATE RECEIVED WON'T DAY YEAR OF DAY
IV. CHARACTERIZATION OF POTENTIAL HAZARD	:
OI ON SITE INSPECTION YES DATE 8 24.67 A EPA 8 E C NO MONTH SALERA E I OCAL HEALTH CE	PAICONTRACTOR C. STATE DID OTHER CONTRACTOR
	RUY F. WESTON
02 SITE STATUS (Check one) 03 YEARS OF OPE	RATION .
A. ACTIVE SB. INACTIVE C. UNKNOWN	BEGINNING YEAR SHOING YEAR
04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED	
CHROTHUM, LEAD, XYLONES, ANH	DROUS ISOPRCIPE ALCOHOL
05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION	
PRINTING WASTES WERE OBSERVED	ON THE GROUND AND IN THE
PAVED AREA WHERE DRUMS ARE ST	966P
V. PRIORITY ASSESSMENT	
01 PRIORITY FOR INSPECTION (Check one. If high or medium is checked, complete Part 2 - Waste in	formation and Part 3 - Description of Hazardous Conditions and incidents;
□ A. HIGH (MEDIUM Inspection required prematiry) □ C. LOW (MEDIUM (Inspection required) □ C. LOW	The available basis D. NONE (No further action needed, complete current disposition form)
YL INFORMATION AVAILABLE FROM	
01 CONTACT 02 OF (Agency, Orga	
RANCIVA KLEIN GA DE	OF OF NATURAL RESUMPLES 14041656 2836
JOHN ADHLEY BROWN EMITAT	ROY F Waster 17641 35 24147
\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \	MONTH DAY YEAR

SEPA

POTENTIAL HAZARDOUS WASTE SITE PRELIMINARY ASSESSMENT PART 2. WASTE INFORMATION

DISTATE DESTREYUNGER

\/	<i>,</i> .		PART 2 - WAST	E INFORMATION	l	4.1	
IL WASTES	TATES, QUANTITIES, AN	D CHARACTER	ISTICS				
DI PHYSICAL S	TATES (Check affinal apple)	32 WASTE QUANT		03 WASTE CHARACT	ERISTICS : Check as that and	2/+)	
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POTENTIAL HAZARDOUS WASTE SITE PRELIMINARY ASSESSMENT

1. IDENTIFICATION

OI STATE OF SITE NUMBER

(7 A VUL 2) 7

PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

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POTEN	ITIAL HAZARDOUS WASTE SITE	I. IDENTIFICATION				
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FRANK TURNER- GOVINGTON CITY	MANAGER					
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EPA FORM 2070-12 (7-81)						



PHOTO# 6 OFFICIAL PHOTOGRAPH ENVIRONMENTAL PROTECTION AGENCY

Subject: SAMPLES COLLECTED, SPECTRUM PRINTING SITE

Location: 4132 US HWY 278 COVINGTON GEORGIA

Date: AUGUST 24, 1987

Time: 10:20 AM

Photographer: J. LATHRAM

Witness: J.A. BROWN

Film: WOLF ASA: 100

Location of Negative: TAT OFFICE

TDD#: 04-8708-03



PHOTO# 5 OFFICIAL PHOTOGRAPH **ENVIRONMENTAL PROTECTION AGENCY**

Subject: SPILLED MATERIAL, SPECTRUM PRINTING SITE

Location: 4132 US HWY 278 COVINGTON GEORGIA Time: 09:35 AM

Date: AUGUST 24, 1987

Witness: J.C. LAN

Photographer: J.A. BROWN Film: WOLF ASA: 100

Location of Negative: TAT OFFICE

TDD#: 04-8708-03



PHOTO# 4 OFFICIAL PHOTOGRAPH ENVIRONMENTAL PROTECTION AGENCY

Subject: SPILLED MATERIAL, SPECTRUM PRINTING SITE

Location: 4132 US HWY 278 COVINGTON GEORGIA

Date: AUGUST 24, 1987

Photographer: J.A. BROWN

Film: WOLF ASA: 100 TDD#: 04-8708-03 Time: 10:20 AM

Witness: J.C. LAN

Location of Negative: TAT OFFICE



PHOTO# 3 OFFICIAL PHOTOGRAPH ENVIRONMENTAL PROTECTION AGENCY

Subject: SPILLED MATERIAL, SPECTRUM PRINTING SITE

Location: 4132 US HWY 278 COVINGTON GEORGIA

Date: AUGUST 24, 1987 **Time:** 10:20 AM

Photographer: J.A. BROWN Witness: J.C. LAN

Film: WOLF ASA: 100 Location of Negative: TAT OFFICE

TDD#:04-8708-03



PHOTO# 2 OFFICIAL PHOTOGRAPH ENVIRONMENTAL PROTECTION AGENCY

Subject: SAMPLING OPERATIONS, SPECTRUM PRINTING SITE

Location: 4132 US HWY 278 COVINGTON GEORGIA

Date: AUGUST 24, 1987

Time: 09:40 AM

Photographer: J. LATHRAM

Witness: KLUTZ

Flimwolf ASA: 100

Location of Negative: TAT OFFICE

TDD#: 04-8708-03



PHOTO# 1 OFFICIAL PHOTOGRAPH **ENVIRONMENTAL PROTECTION AGENCY**

Subject: DRUM STAGING AREA, SPECTRUM PRINTING SITE 4132 US HWY 278

Location: LOOKING SOUTHWEST ACROSS OLD ATLANTA RD., COVINGTON GEORGIA

Date: AUGUST 24, 1987

Time: 09:30 AM Witness: J.C. LAN

Photographer: J.A. BROWN

Film: WOLF ASA: 100

Location of Negative: TAT OFFICE

TDD#: 04-8708-03

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AGREEMENT

I. Parties and Jurisdiction

This Agreement is entered into by and between Richard D. Ellenburg, in his capacity as Trustee in Bankruptcy for Spectrum Printing Company, Inc. (hereafter "the Trustee"), and the United States Environmental Protection Agency (hereafter "EPA"), pursuant to the authority vested in the President of the United States by Section 104, Section 106(a), and Section 122(a) of the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (hereafter "CERCLA"), 42 U.S.C. Section 9604, Section 9606(a), and Section 9622(1), as amended by the Superfund Amendments and Reauthorization Act of 1986 (hereafter called "SARA"), P.L. 99-499 (CERCLA, as amended, may sometimes be hereafter referred to simply as "CERCLA"). SARA portions of the above-cited sections were delegated by the President to the Administrator of EPA by Executive Order 12580, dated January 23, 1987, 52 Fed. Reg. 2923 (Jan. 29, 1987), and were redelegated by interim delegations of the Administrator of EPA to Regional Administrators and Assistant Administrators in EPA Delegation Nos. 14-8-B and 14-14-C, dated February 26, 1987. The Trustee consents to and will not contest EPA jurisdiction or authority to enter into this Agreement.

This Agreement concerns the proposed removal of hazardous substances from the printing facility formerly operated by Spectrum Printing, Company, Inc. in Covington, Georgia (hereafter "the Site").

II. **EPA** Determinations

For the purposes of this Agreement, EPA has determined that:

- A. The release and threat of release of hazardous substances from the Site may present an imminent and substantial endangerment to the public health or welfare or the environment;
- B. In order to protect public health and welfare and the environment, it is necessary that action be taken to mitigate the release and threat of release of hazardous substances from the Site into the environment; and
- C. The actions undertaken to be performed by the Trustee under this Agreement are consistent with the National Contingency Plan, 40 CFR Part 300, as amended.

III. Work To Be Performed

It is hereby agreed that the following activities will be performed:

- A. An Immediate Removal Plan has been submitted on behalf of the Trustee and is incorporated herein by reference as Exhibit A.
- B. A comprehensive Site Safety Plan is to be submitted on behalf of the Trustee within Fourteen (14) days of the effective date of this Agreement. Within Seven (7) days of receipt of the Site Safety Plan, EPA shall notify the Trustee in writing of EPA's approval or disapproval of the Site Safety Plan or any part thereof. In the event of any disapproval, EPA shall specify in writing both the

deficiencies and any EPA recommended modifications.

- C. Within seven (7) days of the receipt of EPA notification of Site Safety Plan disapproval, the Trustee shall amend and submit to EPA a revised plan. In the event of subsequent disapproval of the plan, EPA retains the right to undertake removal or other action pursuant to its authority under CERCLA.
- D. Within five (5) days of EPA approval of the Site Safety Plan, the Trustee shall begin implementation of the tasks detailed in the approved Immediate Removal Plan and Site Safety Plan. The Trustee shall complete implementation within Ninety (90) days of the execution of this Agreement.
- E. All actions carried out by the Trustee pursuant to this Agreement shall be done under the oversight of EPA through its On-Scene Coordinator.
- F. The Trustee shall assure access to the Site by EPA and its employees, contractors and consultants for the purposes of overseeing and monitoring the implementation of this Agreement.
- G. The Trustee shall notify EPA Seven (7) days in advance of each action to be taken at the Site pursuant to this Agreement.
- H. All actions carried out by the Trustee pursuant to this Agreement shall be done in accordance with all applicable federal, state, and local laws.
- I. Upon request, the Trustee will provide EPA with split samples of any samples collected in connection with the performance of this Agreement.

- J. All response work performed pursuant to this Agreement shall be under the direction and supervision of a qualified professional engineer or other qualified professional with expertise and experience in hazardous waste site cleanup. The Trustee shall notify EPA as to such engineer or other qualified professional and of any contractors and subcontractors to be used in carrying out the terms of this Agreement promptly following the execution of this Agreement or in advance of their involvement at the Site, whichever is the later.
- K. The Trustee shall use quality assurance/quality control, and chain-of-custody procedures in accordance with EPA Region IV Environmental Services Division, Standard Operating Procedures and Quality Assurance Manual, April 1, 1986, throughout all activities. The Trustee shall consult with EPA in planning for sampling and analysis. The Trustee shall provide a quality control report to EPA certifying that all activities have been performed as approved.
- L. The Trustee shall preserve all records developed pursuant to the implementation of this Agreement for a period of at least Six (6) years following completion of all work performed pursuant to this Agreement.
- M. Any reports, plans, specifications, schedules and attachments required by this Agreement are, upon approval by EPA, incorporated into this Agreement.
- N. All submittals and notifications to EPA pursuant to this Agreement shall be made to:

Bill Klutz
On-Scene Coordinator
Superfund Branch
Waste Management Division
U.S. EPA - Region IV
345 Courtland Street, N.E.
Atlanta, Goeriga 30365
404/347-3931

O. The Trustee shall provide adequate documentation of the proper disposal of all hazardous substances, by providing the On-Scene Coordiantor with shipment manifests and corresponding inventories.

IV. Reservation of Rights

Nothing in this Agreement will constitute or be construed as a release from any claim, cause or action or demand in law or equity against any person, firm, partnership, or corporation for any liability it may have arising out of or relating in any way to the generation, storage, treatment, handling, transportation, release, or disposal of any hazardous substances, hazardous waste, pollutants, or contaminants found at, taken to, or taken from the Site.

This Agreement does not constitute any decision on preauthorization of funds under Section 111(a)(2) of CERCLA.

In entering into this Agreement, the Trustee waives any right to seek reimbursement under Section 106(b)(2) of CERCLA, 42 U.S.C. Section 9606(b)(2), for any past costs associated with this Site, or any costs incurred in complying with this Agreement.

EPA reserves the right to take any enforcement action pursuant to CERCLA or any other available legal authority, including

the right to seek injunctive relief, monetary penalties, and punitive damages for any violation of law or this Agreement.

V. Notification of the State

Pursuant to Section 106(a) of CERCLA, 42 U.S.C. Section 9606(a), the State of Georgia has been notified of this Agreement by EPA.

VI. Effective Date and Completion

The effective date of this Agreement shall be the date on which it is signed on behalf of EPA or the date on which it is approved by the Bankruptcy Court, whichever is later.

The provisions of this Agreement will be deemed fulfilled upon the Trustee's receipt of written notice from EPA that the Trustee has demonstrated to the satisfaction of EPA that all the terms of this Agreement have been completed. Such written notice shall not be unreasonably withheld.

IT IS SO AGREED:

BY:			
	Richard Ellenberg, as Trustee Spectrum Printing	for	Date
BY:			
	U.S. Environmental Protection A	gency	Date

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EXHIBIT 1

IMMEDIATE REMOVAL PLANS

- 1. Within ten days from approval of the Agreement by the Trustee, the EPA, and the Bankruptcy Court, the Trustee's contractor will mobilize a chemist and two technicians to the site to spend one to two days to sample, and perform hazard categorization and staging. The contractor currently understands that there are sixty 5-gallon ink pails, three 55-gallon drums of isopropyl alcohol, and one hundred eighty-five 55-gallon drums (most of which are open and appear to contain water). Additionally, two areas of contaminated dirt (estimated to contain approximately ten 55-gallon drums) will be excavated. Sludge under the presses will be cleaned up and disposed of.
- 2. During this initial staging, the Trustee's Contractor will composite five different waste streams consisting of water, inks, isopropyl alcohol, adhesives, and contaminated dirts and sludges. As needed, the waste streams will be analyzed in order to obtain disposal approval.
- 3. When the sample results are returned and disposal approval is gained, the Trustee's contractor will remobilize one chemist, two technicians, and an operator to bulk and dispose of the materials. Should the water be classified as non-hazardous, the Trustee's contractor will, on behalf of the Trustee, obtain permits to discharge to sewers. Inks will be returned to the

manufacturer. Flammable liquids will be tendered to M&J Solvents in Atlanta. The adhesives and dirt (if tested as hazardous) will be tendered to the Chemical Waste Management Landfill in Emelle, Alabama.

- 4. Other trash, pallets, and empty drums will be tendered to a sanitary landfill. This "cleaning" portion of the job, as set forth in paragraphs 3 and 4 herein, is estimated to take approximately seven days. The Trustee's contractor will be using a vacuum unit, forklift, and backhoe.
- 5. At each stage of the proceeding, the Trustee's contractor will offer to the Agency duplicate copies of the results of analyses performed. The Trustee's contractor has represented to the Trustee that necessary permits and arrangements will be made in accordance with applicable environmental laws.
- 6. All work performed pursuant to this Immediate Removal Plan shall be under the direction and supervision of qualified personnel with expertise and experience in hazardous waste site clean up.

COST CENTER 04	ACKNOWLEDGEMENT OF COMP PERFORMANCE OBSERVATION REP	ORT: PART I 04-8810-26-2026
CONTRACT NO:	CONTRACTOR:	TDD NO. 04881026A
68-01-7367	ROY F. WESTON, INC.	2213
REPORTING ELEMENT:	DATE(S) OF REPORTED OBSERVATION APPR	ROX. NO. OF HOURS
PERFORMANCE EVALUA	11 PEMOVAIS (FUNDED)	LETTER REPORT
DESCRIPTION OF CONT	RACTOR OBSERVATION BY: NAME/TITLE CONLEY B. PI	1 []
AND PRP MONITED FACILITY LOCATED TRACTOR IN THE EXPERTISE IN TAT MADE NUMBER	WITH PROVIDING REMOVAL SUPPORT, GEN FORING INVOLVING PRINTING WASTES AT ATED IN COVINGTON, NEWTON CO., GA. THE DEVELOPMENT OF A COMPREHENSIVE SI SAMPLING PROTOCOL, AND DOCUMENTED A EROUS SUGGESTIONS TO THE PRP WHICH W	THE SPECTRUM PRINTING TAT ASSISTED THE PRP CON- TTE SAFETY PLAN, PROVIDED ALL ASPECTS OF THE REMOVAL.
RATING: 5,4,3,2,1	SIGNATURE OF CONTRACTOR: BSERVATION BY: NAME/TITLE	DATE: 6/12/89
	\$ ·	
RATING: 5,4,3,2,1	SIGNATURE OF EPA:	DATE:
SIGNATURE OF REGION	AL POR COORDINATOR:	DATE:
HQ COORDINATOR'S EV	ALUATION BY: NAME/TITLE	
RATING: 5,4,3,2,1	ISIGNATURE OF HQ:	DATE:
DPO ACTION:	ACCEPTED ACCEPTED WITH	1 EXCEPTIONS REJECTED
COST TO DATE:	DATE: 06/01/89 ACTUAL	L TOTAL HOURS: 173
TOTAL COST TO CLOSU	RE:	
Conly (NATURE INTERIM) TATL SIGNATURE	4/12/89 INTERIM
TACKNOWLEDGE THAT SUBJECT TOD WITHIN IT	THAVE BEEN PROVIDED WITH THE MATERIALS AND SERVICES IS ORIGINAL OR REVISED TIME FRAMES. DPO SIGNATURE	FINAL

WHITE - HDQTRS COORDINATOR
WHITE - DPO COPY
BLUE - TATL COPY
GREEN - ZPM COPY
CANARY - PROJECT OFFICER COPY
HNK - CONTRACTING OFFICER COPY
GOLDENROD - DPO (INTERIM COPY)

TDD #04-8810-26-2026 #04-8810-26A-2213 (ATTACHMENT)

SPECTRUM PRINTING COVINGTON, NEWTON CO., GA

SUBSEQUENTLY RESPONSIBLE FOR INCREASING THE OVERALL TIMELINESS AND EFFECTIVENESS OF THE ACTION. TAT MAINTAINED CONSTANT CONTACT WITH THE OSC APPRISING HIM OF REMOVAL PROGRESS AND PROBLEMS ENCOUNTERED. A DETAILED REPORT IS CURRENTLY BEING COMPILED TO DOCUMENT PRP ACTIONS AT THIS SITE.

TAT CPAF CONTRACT PERFORMANCE OBSERVATION REPORT (POR) PART II, EVALUATION CRITERIA RATING WORKSHEET TOD NO: CONTRACTOR: CONTRACT NO 1 Roy F. Weston 68-01- 7367 APPROX. NO. OF HOURS DATEIS) OF REPORTED OBSERVATION REPORTING ELEMENT: 1/89 10//188 Kedien PERFORMANCE EVALUATION CATEGORY: EPA PERFORMANCE MONITOR CONTRACTOR REPRESENTATIVE SUPPORTING COMMENTS RATING PERFORMANCE CRITERIA PROJECT PLANNING 5 - ORGANIZING IE.G. WORK PLAN DEVELOPMENT, DATA HEVILW) - SCHEDULING - BUDGETING TECHNICAL COMPETENCE & INNOVATION - EFFECTIVENESS OF ANALYSES - MEET PLAN GOALS - ADMERE TO REGS. & PROCEDURES - APPROACH CREATIVITY/INGENUITY ..___5 4 ____3 __ 2 SCHEDULE & COST CONTROL - BUDGET HOURS & COSTI MAINTENANCE - PRIORITY/SCHEDULE ADJUSTMENTS - COST MIRMIZATION ____5 __ 3 __ 1 REPORTING - THREEMESS OF DELIVERABLES - CLARIT - THOROUGHHESS ____3 __ 2 Report 4.55 21/2 monts RESOURCE UTILIZATION - STAFFING - SUBCOMMENT, TRAVEL, ETC. _ 5 _3 - 2 EFFORT ._ 5 - PESPOUSIVENESS - MOBILIZATION - DAY TO DAY - SPECIAL SUBJATIONS IF G., ADVERSE/ CAMSEROUS CONDITIONS) .. : _. ___ 3



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E. ATLANTA, GEORGIA 30365

ENFORCEMENT CONFIDENTIAL

MEMORANDUM

DATE:

FEB 5 1990

SUBJECT:

Decision not to Take Cost Recovery Action Regarding

Spectrum Printing Company, Inc. Removal Site

(EPA ID #9N)

A. Site Description

The Site in question was formerly operated as a printing facility by Spectrum Printing Co., Inc. In October 1987, EPA was notified of the proposed sale of the Site in connection with the company's bankruptcy proceeding under under Chapter 7. In response, the Department of Justice, acting on behalf of EPA, notified the company that EPA had obtained information that there had been a release of hazardous substances at the Site and that EPA was evaluating whether EPA would take action at the Site pursuant to Section 104 of CERCLA. Subsequently, in 1988, EPA entered into an "Agreement," under which the company has performed the needed removal activities. The removal has been completed.

B. Work Authorized and Conducted and Associated Costs

When EPA was first notified of this Site, the materials stored outside the building were sampled using the Emergency Response and Control Section's Technical Assistance Team (TAT) contractor. Sample results revealed the presence of solvents in waste ink. After the Agreement was executed, the TAT contractor was again used to perform on-site monitoring to insure that the company's contractor complied with the Agreement and any applicable rules and regulations.

EPA's expenditures were as follows:

Contracts \$3,713.37
Payroll 650.54
Indirect 1,668.00
\$6,031.91

C. <u>Discussion of Basis Not To Pursue Cost Recovery</u>

The basis for the decision not to pursue cost recovery for this Site includes the following facts:

The principal reason not to pursue cost recovery for this Site is the insolvency of the company which owned and operated the Site.

Even though the company had filed for bankruptcy under Chapter 7 of the Bankruptcy Code, we were able to obtain the agreement of the bankruptcy trustee to conduct the needed removal activities. The work was done under an "Agreement" entered into under Sections 104, 106(a) and 122(a) of CERCLA, which incorporated an approved Immediate Removal Work Plan. In view of our lack of authority to issue an order to the bankrupt compelling the work to be done, the Agreement was somewhat less formal that an Administrative Order, and it did not include a provision for the payment of oversight costs.

The bankruptcy action remains pending according to the attorney for the trustee. In this situation, our sole recourse would have been the filing of a proof of claim in the bankruptcy, and the bar date for such a filing has passed and likely had already passed when the Agreement was executed. Consequently, these oversight costs should be considered not recoverable due to the bankruptcy of the responsible party.

Aside from the insolvency of the corporate owner, other factors support the decision not to pursue cost recovery. While we did not explicitly waive payment of oversight costs in the Agreement, we did not request them and should not pursue them after the fact, particularly in light of the cooperation of the company's representatives in agreeing to conduct the work In addition, the automatic stay in bankruptcy would preclude our taking formal action outside of the bankruptcy court to recover our costs.

Conclusion D.

In light of the insolvency and pending bankruptcy of the corporate owner and operator and the cooperation of the bankruptcy trustee in conducting the removal, cost recovery action for EPA's costs of \$6,031.91 should not be pursued.

Reviewer: Project Manager, Cost Recovery Section

Concurrences:

2/1/90 | Ruly F. Borne les 2/1/90

South Cost Recovery Unit

Office of Regional Counsel

Michael Hartalt for B. Spaga	2/1/90
Chief, Corr Recovery Section	- 7 . 3
Miscur	2/2/97
Chief, Waste Programs Branch	7 7
Satrice M Town	2-5-20
Director, Waste Management Division	

Yellow

AGREEMENT

I. Parties and Jurisdiction

This Agreement is entered into by and between Richard D. Ellenburg, in his capacity as Trustee in Bankruptcy for Spectrum Printing Company, Inc. (hereafter "the Trustee"), and the United States Environmental Protection Agency (hereafter "EPA"), pursuant to the authority vested in the President of the United States by Section 104, Section 106(a), and Section 122(a) of the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (hereafter "CERCLA"), 42 U.S.C. Section 9604, Section 9606(a), and Section 9622(1), as amended by the Superfund Amendments and Reauthorization Act of 1986 (hereafter called "SARA"), P.L. 99-499 (CERCLA, as amended, may sometimes be hereafter referred to simply as "CERCLA"). SARA portions of the above-cited sections were delegated by the President to the Administrator of EPA by Executive Order 12580, dated January 23, 1987, 52 Fed. Reg. 2923 (Jan. 29, 1987), and were redelegated by interim delegations of the Administrator of EPA to Regional Administrators and Assistant Administrators in EPA Delegation Nos. 14-8-B and 14-14-C, dated February 26, 1987. Trustee consents to and will not contest EPA jurisdiction or authority to enter into this Agreement.

This Agreement concerns the proposed removal of hazardous substances from the printing facility formerly operated by Spectrum Printing, Company, Inc. in Covington, Georgia (hereafter "the Site").

II. EPA Determinations

For the purposes of this Agreement, EPA has determined that:

- A. The release and threat of release of hazardous substances from the Site may present an imminent and substantial endangerment to the public health or welfare or the environment;
- B. In order to protect public health and welfare and the environment, it is necessary that action be taken to mitigate the release and threat of release of hazardous substances from the Site into the environment; and
- C. The actions undertaken to be performed by the Trustee under this Agreement are consistent with the National Contingency Plan, 40 CFR Part 300, as amended.

III. Work To Be Performed

It is hereby agreed that the following activities will be performed:

- A. An Immediate Removal Plan has been submitted on behalf of the Trustee and is incorporated herein by reference as Exhibit A.
- B. A comprehensive Site Safety Plan is to be submitted on behalf of the Trustee within Fourteen (14) days of the effective date of this Agreement. Within Seven (7) days of receipt of the Site Safety Plan, EPA shall notify the Trustee in writing of EPA's approval or disapproval of the Site Safety Plan or any part thereof. In the event of any disapproval, EPA shall specify in writing both the

deficiencies and any EPA recommended modifications.

- C. Within seven (7) days of the receipt of EPA notification of Site Safety Plan disapproval, the Trustee shall amend and submit to EPA a revised plan. In the event of subsequent disapproval of the plan, EPA retains the right to undertake removal or other action pursuant to its authority under CERCLA.
- D. Within five (5) days of EPA approval of the Site Safety Plan, the Trustee shall begin implementation of the tasks detailed in the approved Immediate Removal Plan and Site Safety Plan. The Trustee shall complete implementation within Ninety (90) days of the execution of this Agreement.
- E. All actions carried out by the Trustee pursuant to this Agreement shall be done under the oversight of EPA through its On-Scene Coordinator.
- F. The Trustee shall assure access to the Site by EPA and its employees, contractors and consultants for the purposes of overseeing and monitoring the implementation of this Agreement.
- G. The Trustee shall notify EPA Seven (7) days in advance of each action to be taken at the Site pursuant to this Agreement.
- H. All actions carried out by the Trustee pursuant to this Agreement shall be done in accordance with all applicable federal, state, and local laws.
- I. Upon request, the Trustee will provide EPA with split samples of any samples collected in connection with the performance of this Agreement.

- J. All response work performed pursuant to this Agreement shall be under the direction and supervision of a qualified professional engineer or other qualified professional with expertise and experience in hazardous waste site cleanup. The Trustee shall notify EPA as to such engineer or other qualified professional and of any contractors and subcontractors to be used in carrying out the terms of this Agreement promptly following the execution of this Agreement or in advance of their involvement at the Site, whichever is the later.
- K. The Trustee shall use quality assurance/quality control, and chain-of-custody procedures in accordance with EPA Region IV Environmental Services Division, Standard Operating Procedures and Quality Assurance Manual, April 1, 1986, throughout all activities. The Trustee shall consult with EPA in planning for sampling and analysis. The Trustee shall provide a quality control report to EPA certifying that all activities have been performed as approved.
- L. The Trustee shall preserve all records developed pursuant to the implementation of this Agreement for a period of at least Six (6) years following completion of all work performed pursuant to this Agreement.
- M. Any reports, plans, specifications, schedules and attachments required by this Agreement are, upon approval by EPA, incorporated into this Agreement.
- N. All submittals and notifications to EPA pursuant to this Agreement shall be made to:

Bill Klutz
On-Scene Coordinator
Superfund Branch
Waste Management Division
U.S. EPA - Region IV
345 Courtland Street, N.E.
Atlanta, Goeriga 30365
404/347-3931

O. The Trustee shall provide adequate documentation of the proper disposal of all hazardous substances, by providing the On-Scene Coordiantor with shipment manifests and corresponding inventories.

IV. Reservation of Rights

Nothing in this Agreement will constitute or be construed as a release from any claim, cause or action or demand in law or equity against any person, firm, partnership, or corporation for any liability it may have arising out of or relating in any way to the generation, storage, treatment, handling, transportation, release, or disposal of any hazardous substances, hazardous waste, pollutants, or contaminants found at, taken to, or taken from the Site.

This Agreement does not constitute any decision on preauthorization of funds under Section 111(a)(2) of CERCLA.

In entering into this Agreement, the Trustee waives any right to seek reimbursement under Section 106(b)(2) of CERCLA, 42 U.S.C. Section 9606(b)(2), for any past costs associated with this Site, or any costs incurred in complying with this Agreement.

EPA reserves the right to take any enforcement action pursuant to CERCLA or any other available legal authority, including

the right to seek injunctive relief, monetary penalties, and punitive damages for any violation of law or this Agreement.

V. Notification of the State

Pursuant to Section 106(a) of CERCLA, 42 U.S.C. Section 9606(a), the State of Georgia has been notified of this Agreement by EPA.

VI. Effective Date and Completion

The effective date of this Agreement shall be the date on which it is signed on behalf of EPA or the date on which it is approved by the Bankruptcy Court, whichever is later.

The provisions of this Agreement will be deemed fulfilled upon the Trustee's receipt of written notice from EPA that the Trustee has demonstrated to the satisfaction of EPA that all the terms of this Agreement have been completed. Such written notice shall not be unreasonably withheld.

IT IS SO AGREED:

Richard Ellenberg, as Trustee for Spectrum Printing	Date
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I.S. Environmental Protection Agency	Date

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EXHIBIT 1

IMMEDIATE REMOVAL PLANS

- 1. Within ten days from approval of the Agreement by the Trustee, the EPA, and the Bankruptcy Court, the Trustee's contractor will mobilize a chemist and two technicians to the site to spend one to two days to sample, and perform hazard categorization and staging. The contractor currently understands that there are sixty 5-gallon ink pails, three 55-gallon drums of isopropyl alcohol, and one hundred eighty-five 55-gallon drums (most of which are open and appear to contain water). Additionally, two areas of contaminated dirt (estimated to contain approximately ten 55-gallon drums) will be excavated. Sludge under the presses will be cleaned up and disposed of.
- 2. During this initial staging, the Trustee's Contractor will composite five different waste streams consisting of water, inks, isopropyl alcohol, adhesives, and contaminated dirts and sludges. As needed, the waste streams will be analyzed in order to obtain disposal approval.
- 3. When the sample results are returned and disposal approval is gained, the Trustee's contractor will remobilize one chemist, two technicians, and an operator to bulk and dispose of the materials. Should the water be classified as non-hazardous, the Trustee's contractor will, on behalf of the Trustee, obtain permits to discharge to sewers. Inks will be returned to the

manufacturer. Flammable liquids will be tendered to M&J Solvents in Atlanta. The adhesives and dirt (if tested as hazardous) will be tendered to the Chemical Waste Management Landfill in Emelle, Alabama.

- 4. Other trash, pallets, and empty drums will be tendered to a sanitary landfill. This "cleaning" portion of the job, as set forth in paragraphs 3 and 4 herein, is estimated to take approximately seven days. The Trustee's contractor will be using a vacuum unit, forklift, and backhoe.
- 5. At each stage of the proceeding, the Trustee's contractor will offer to the Agency duplicate copies of the results of analyses performed. The Trustee's contractor has represented to the Trustee that necessary permits and arrangements will be made in accordance with applicable environmental laws.
- 6. All work performed pursuant to this Immediate Removal Plan shall be under the direction and supervision of qualified personnel with expertise and experience in hazardous waste site clean up.

HANSELL & POST

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

THIRTY-THIRD FLOOR FIRST ATLANTA TOWER
ATLANTA, GEORGIA 30383-3101
TELEPHONE 404 581-8000
TELECOPIER 404 581-8330
TELEX 54-2711

56 PERIMETER CENTER EAST, N.E. FIFTH FLOOR ATLANTA, GEORGIA 30346-2283

1667 K STREET, N.W. SUITE 500 WASHINGTON, D.C. 20006-1692

July 19, 1988

Mr. William Klutz Hazardous Waste Law Branch United States Environmental Protection Agency Region IV 345 Courtland Street, N.E. Atlanta, Georgia 30365

RE: Spectrum Printing Site

Dear Bill:

Enclosed please find a copy of the Notice received from the United States Bankruptcy Court setting a hearing on the Motion to Approve the Trustee's entering into a Contract with the Environmental Protection Agency. You will note that the hearing is set for August 16, 1988. Also, as stated in the Notice, objections to the Motion must be filed with the Clerk of the Court not later than five working days prior to the hearing. At this time, we are unaware of any objections having been filed.

Sincerely,

Greatry R. Hanthorn

GRH/dr

Enclosure.

cc: Truly F. Bracken, Esquire

IN THE UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION

IN RE

CASE NO. A87-04856-ADK

SPECTRUM PRINTING CO., INC.,

:

Debtor.

NOTICE

Notice is hereby given that Trustee has filed a motion to enter into a contract with the Environmental Protection Agency to cause removal of certain hazardous waste from the property of the Estate and to hire the contractors necessary to perform such work. Trustee has requested that approval of the contract be conditioned upon the Estate and Trustee not being subject to liability for breach of the contract and Trustee being authorized to delegate any and all duties under the contract.

Trustee has also filed a motion to obtain secured financing to fund the work called for under said Agreements. The secured financing motion proposes that the holder of a deed to secure debt on the property in question, The First National Bank of Atlanta, provide the funding to be secured by the same collateral and priority held by that lender as of the filing of the petition in this case.

Copies of all such motions are filed with the Clerk of the Court and available for inspection.

Notice is hereby given that a hearing shall be held upon said Motions before the Court on the day of two., 1988 at 000 o'clock A.M. in Room 700, United States Bankruptcy Court, 75 Spring Street, S.W., Atlanta, Georgia 30303. Notice is further given that any objections to said Motions must be filed with the Clerk of this Court not later than five (5) working days prior to the said hearing with a copy served upon counsel for Trustee.

so ORDERED this 14 day of July

, 1988.

A. D. KAHN

United States Bankruptcy Judge

Prepared by:

Jámes S. Altman

83 Walton Street, N.W. Atlanta, Georgia 30303

(404) 525-4000



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET ATLANTA, GEORGIA 30365

Ms. Cindy Love
Haztech Inc.
5280 Panola Industrial Blvd.
Decatur Ga. 30065

Dear Cindy:

In reference to our conversation of December 14, 1988 regarding the hazardous waste classification of the organic material at the Spectrum Printing site in Covington, Georgia. Subsequent to an indeterminate finding by Region IV RCRA, and review of the data, the organic/pigmented waste at the site is not representative of a K086 classification. However, due to the presence of organic solvents in EPA's composite sampling and the large quantity of organic solvents present at the site, the pigmented organic compounds appear to belong to the F003, F005 and/or the D001 listings where applicable. Both F class waste codes are appropriate for nonhalogenated solvent waste from nonspecific sources. D001 could also apply, since most solvent waste have a flashpoint of less than 140 degrees Fahrenheit.

If you have any questions or want to discuss this further please give me a call at 404/347-3931.

Sincerely

Bill Klutz



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET ATLANTA, GEORGIA 30365

copy to Specium

Ms. Cindy Love
Haztech Inc.
5280 Panola Industrial Blvd.
Decatur Ga. 30065

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If you have any questions or want to discuss this further please give me a call at 404/347-3931.

Sincerely

Bill Klutz

Mr. Gregory R. Hanthorn Hansell & Post First Atlanta Tower Atlanta, Georgia 30383-3101

Re: Spectrum Printing Company, Inc. Site

Dear Mr. Hanthorn:

We have received the manifests documenting the shipment of wastes from the Spectrum Printing Company, Inc. site, together with the data from sampling conducted at the site. Based upon these documents and other information previously provided to EPA and its Technical Assistance Team contractor, you are hereby notified that the terms of the Removal Agreement regarding this site have been satisfactorily completed.

We appreciate your continued cooperation in seeing this removal action through to completion.

Sincerely,

Truly F. Bracken Assistant Regional Counsel Hazardous Waste Law Branch

bcc: Bill Klutz

TBRACKEN/5-5-89



Westinghouse Environmental Services

Westinghouse HAZTECH, Inc.

June 5, 1989

5280 Panola Industrial Boulevard Decatur, Georgia 30035 (404) 981-9332 (404) 981-9339 (24 Hr.) FAX (404) 981-1786

Mr. Richard Ellenberg, Trustee c/o Mr. Gregory R. Hanthorn Hansell and Post First Atlanta Tower, 33rd Floor Atlanta, Georgia 30383-3101

RE: Spectrum Printing
Project Documents

Project Number 2322-88-1240

Dear Mr. Ellenberg:

Please find attached the original, completed manifest for the five final drums of waste shipped from Spectrum to Rineco. As per 40 CFR Part 268.7 (a)(6) this documentation must be kept on file for five years from the final date of waste shipment.

Sincerely,

Westinghouse Environmental and Geotechnical Services, Inc.

Cynthia Love Project Manager

cc: Mr. Bob Handler
 First National Bank of Atlanta
 Mail Code 212, 2 Peachtree Street
 Atlanta, GA 30349

Mr. Bill Klutz Environmental Protection Agency 345 Courtland Street, N.E. Atlanta, GA 30365



Department of Pollution Control and Ecology P. O. Box 9583 Little Rock, Arkansas 72219 Telephone 501-562-7444

(£)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-30-91

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

DATE: NOV 2 7 1988

SUBJECT

Identification of RCRA Hazardous Wastes at Spectrum Printing Company in Covington, Georgia

FROM:

Craig Brown CON

TO:

Bill Klutz Superfund Branch

A hazardous waste removal contractor has been retained to clean up the Spectrum Printing site located in Covington, Georgia. One of the clean-up/removal alternatives under consideration is consolidation and stablization of some 300 containers of waste with subsequent disposal in a solid waste landfill. Unless it can be reasonably ascertained that there are no RCRA listed hazardous wastes present at this site EPA should not approve any plan which involves wholesale consolidation and stablization of wastes, particularly if the treated waste is to be disposed of in a solid waste landfill.

It is my understanding that waste characterization carried out during the site investigation was limited to obtaining a physical description of the wastes and testing several composite samples for specific constituents. Although this type of information is useful in sorting waste containers into compatible groups to facilitate safe handling it has little practical value in terms of identifying RCRA hazardous wastes.

Characteristic hazardous wastes can be easily identified by testing representative waste samples for ignitability, corrositivity, E P toxicity, and reactivity as specified in 40 CFR Part 261 and Test Methods for Solid Waste (SW-846). Identifying listed hazardous wastes that may be present at the site would be more difficult since RCRA waste listings are source specific and/or chemical specific. However, print shops which use certain solvents for cleaning presses and other equipment would be expected to generate spent solvents (F001-F005). Additionally, print shops which formualte or mix their own lead or chrome based inks would be expected to generate wash water and sludge from cleaning the mixing equipment (K086). It could reasonably be assumed that inks were formulated onsite if the facility is equipped with mixing vessels or grinding mills.

The best way to determine what if any listed hazardous wastes may be present at the Spectrum Printing site would be to interview the former owner or employees. If this is not possible an indication of the types of waste present at the Spectrum site can be provided from waste audits of print shops similar to the Spectrum Printing Company. However, even if waste composition data were available, direct comparison of samples of waste from Spectrum to wastes generated by active print shops may not be conclusive given that some of the containers at Spectrum were left uncovered, outdoors for months. Finally, if there are drums of unused chemicals inside the building at the Spectrum site the labels on the drums may be checked against the list of commercial chemical products in 40 CFR §261.33, which are hazardous wastes when discarded.